

Mount Rainier

U.S. Department of the Interior
National Park Service
Mount Rainier National Park



Commercial Services Plan 2005

Mount Rainier National Park

A Message from the Superintendent

When we set out to revise the plan for commercial services, we asked ourselves, the public and the business community the following questions. How should we manage commercial services in Mount Rainier National Park? What kinds of businesses are necessary and/or appropriate in the park? At what levels should these businesses operate? The revised Commercial Services Plan and accompanying Finding of No Significant Impact are intended to answer these questions.

We began the process with public scoping meetings held in the spring of 2002. The comments received as a result of this process provided us with the information required to develop the draft Commercial Services Plan. That plan and the Environmental Assessment were released for a 90 day public comment period that began on August 27, 2003. Four public meetings were held to seek comments. Approximately 1,900 letters and emails were received. The planning team then reviewed the public comments and revised the plan as a result of the public process.

This plan describes how activities, such as guided climbing, guided wilderness (summer and winter), and other guided services such as day hiking and road-based tours will be managed over the next five to ten years. As reflected in the plan, we value the assistance that the planning team has received over the past several years from both independent and guided visitors, and the business community. We believe that this plan allows us to achieve a balance that meets the needs of our visitors while protecting park resources for future generations.

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Superintendent, Mount Rainier National Park

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Why A Commercial Services Plan?

National parks are special places, saved by the American people so that all may experience our heritage. Parks like Mount Rainier help preserve our collective identity and are a source of great national pride. The Commercial Services Plan for Mount Rainier is one way of protecting the park. Park staff must manage commercial services so that natural and cultural resources remain unimpaired today—and forever.

Mount Rainier National Park Legislative Purpose

Congress established Mount Rainier National Park on March 2, 1899. The park's enabling legislation, legislation which established the National Park Service, subsequent laws, executive orders, and policy directives, call for Mount Rainier National Park to be managed:

- To protect and preserve its natural and cultural resources, processes, and values, while recognizing their increasing importance in the region, the nation, and the world;
- To provide opportunities for visitors to experience and understand the park environment without impairing its resources; and
- To maintain wilderness values, while providing for wilderness experiences.

The national parks movement of the mid- nineteenth century was fueled by a determination to save beautiful and historic spots in America, in part to keep them from being covered with hotels, curio shops, and amusements. Over- commercialization and development can spoil the very character of the places visitors come to see. Yet some kinds of commercial activities are appropriate in national parks (and sometimes necessary, too). They help visitors enjoy natural and cultural wonders to which they might not otherwise have access. Often commercial operators help protect park resources. A wilderness guide, for example, may be the first person who talks to a client about environmental ethics.

Mount Rainier National Park entered into a public scoping process in the spring of 2002 to determine the commercial services that should be provided at the park, the level of that commercial activity, and the areas that should be commercial free. This plan is the result of several years of review of proposed and actual commercial services in the park, comments received during the public process, and the professional judgment of park managers.

This plan will serve as a comprehensive guide for managing Mount Rainier's commercial services over the next five to ten years. The plan establishes guidelines for identifying,

regulating and minimizing the effects of commercial services on park resources. These guidelines are consistent with the General Management Plan, the National Park Service's and the park's mission, goals, policies, management documents, and applicable laws.

A Dynamic Plan

To be useful, the Commercial Services Plan must be flexible. To protect park resources and the quality of the visitor experience, changes may be made to this plan after its publication. Party size limits, client to guide ratios, route and trail use, seasonal use dates, and other specifications may be revised in response to new information, such as visitor carrying capacity studies, assessments of impacts to resources, the development of a park institute, and changes in park programs. Approved activities, if found incompatible with resource protection, visitor enjoyment, and/or safety, may be suspended or terminated. Certain components of the plan may be phased-in over time.

Particularly for CUAs (especially day use CUAs which are primarily experimental), but also for concessions, the level of services authorized will be evaluated as data are collected during monitoring. Monitoring would include:

- Assessing fulfillment of resource protection objectives;
- Evaluating the demand for services associated with the activity;
- Comparing the commercial service to any new NPS programs that may fulfill the same needs; and
- Reassessing whether the expected benefits associated with the activity actually occur.

Possible adjustments include, but are not limited to:

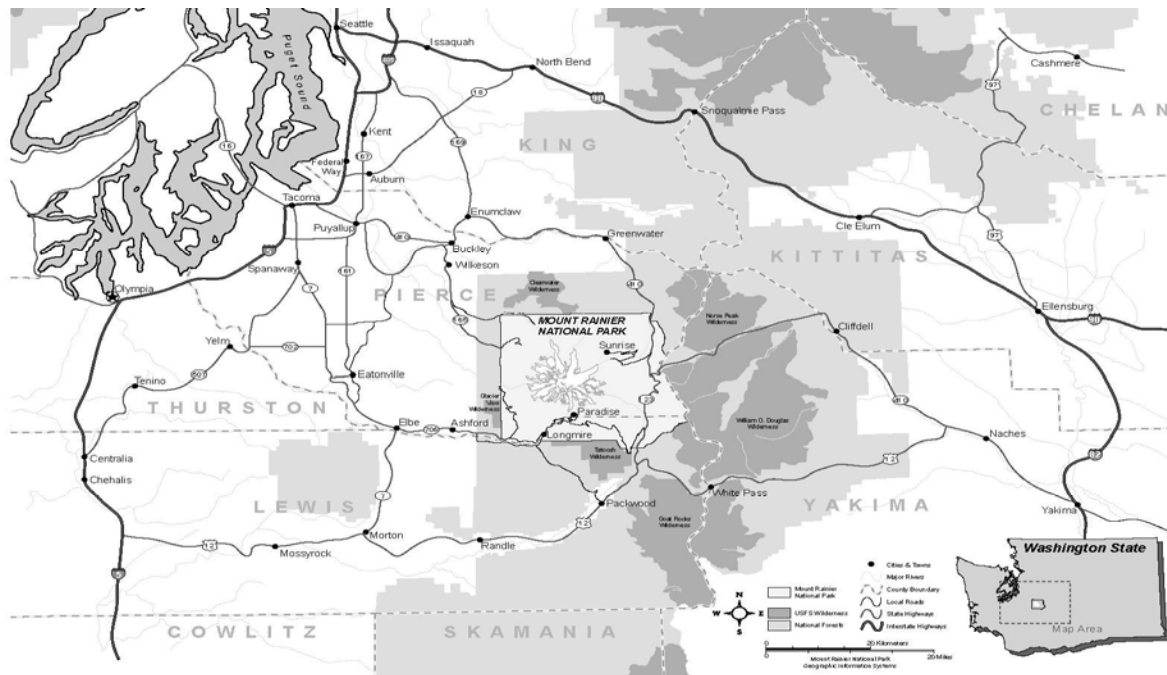
- Adjusting the number of CUAs;
- Adjusting the number and/or types of trips;
- Changing or eliminating the locations where the activity could occur; and/or
- Eliminating the program entirely.

As appropriate, additional environmental analysis would occur.

Park Setting

A Regional Perspective

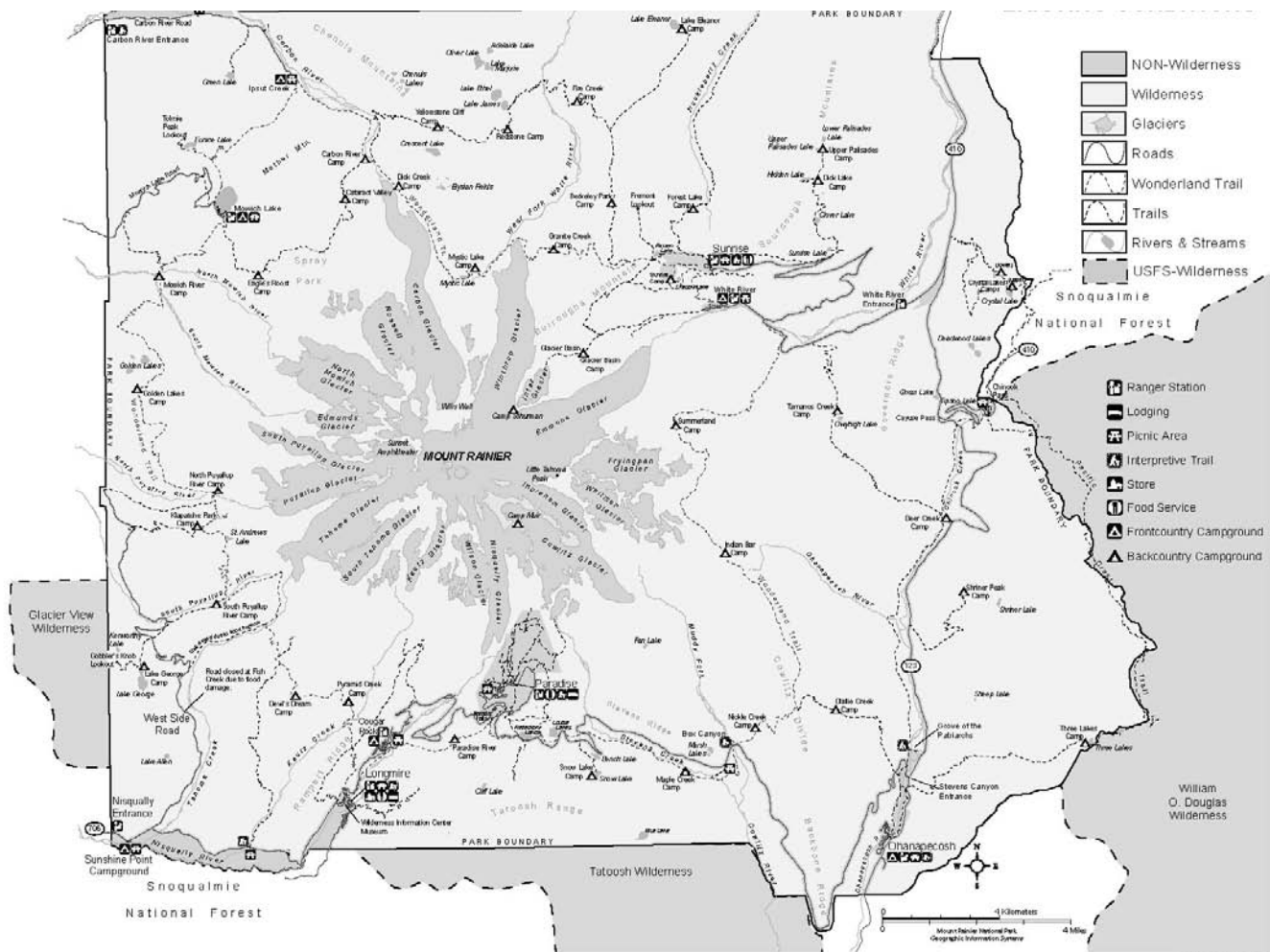
Mount Rainier National Park lies just west of the Cascade Mountain Range in the southwestern part of Washington. Stretching over 235,625 acres, the park is approximately sixty- five miles southeast of the Seattle- Tacoma metropolitan areas and sixty- five miles west of Yakima. Eighty three percent (196,181 acres) of the park lies in Pierce County and 17 percent (39,444 acres) is in Lewis County. In the heart of the park is the mountain itself, which towers above the surrounding Cascade summits and dominates the Puget Sound landscape.



A Local Perspective

A visitor to Mount Rainier National Park enters a world of dense old-growth forests, dazzling wildflower meadows, tremendous snowfields, and rugged glaciers. Elevations in the park range from about 1,380 feet above sea level at the Tahoma Woods Administrative Site to 14,410 feet at the summit of Mount Rainier.

Below the summit, steep glaciated valleys and ice-carved peaks dominate the landscape. The Carbon, Mowich, White, Nisqually, South Puyallup, and North Puyallup rivers and their tributaries carry water from Mount Rainier to the Puget Sound. The Ohanapecosh flows into the Cowlitz River before exiting the park on its way to the Columbia River.



Visitation and Use

Mount Rainier National Park is one of the most popular visitor attractions in the Pacific Northwest. Visitation to Mount Rainier National Park, with some exceptions, increased at a steady rate until it peaked in the early 1970's. Over the last ten years, visitation has averaged about two million visitors annually. Seventy- two percent of those visitors come between June and September. Peak visitor months are July and August.

Located an hour and a half from metropolitan Puget Sound, Mount Rainier is within easy reach. Visitation is highly dependent on the weather, with the most visits occurring on sunny summer weekends. During winter months, visitation decreases substantially, although the Paradise parking lot still fills to capacity on sunny winter weekends. Most visitors come during the day and do not camp in the park overnight.

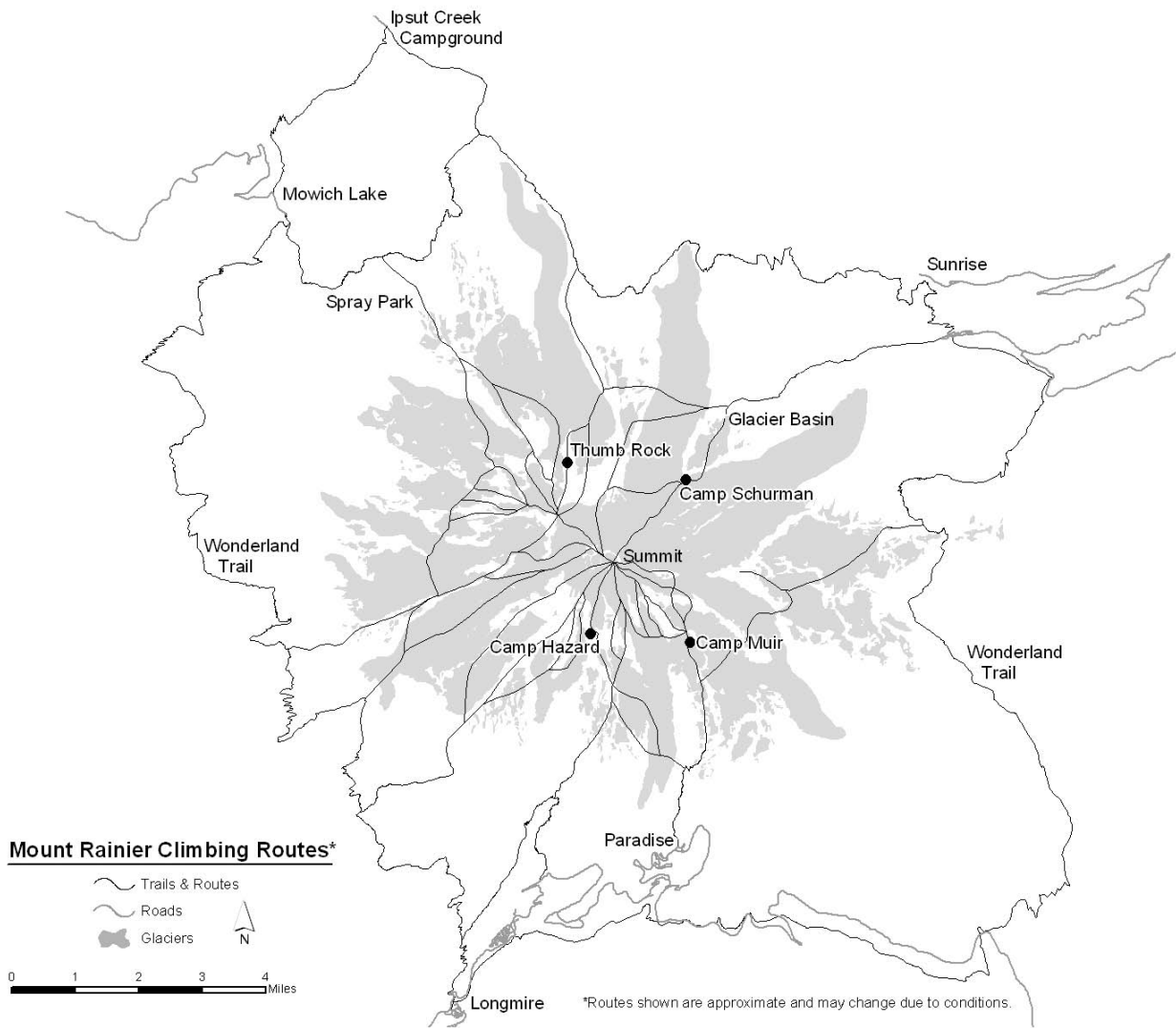
Climbing Routes

Mount Rainier is an active volcano which covers an area of about 100 square miles. Twenty- six major glaciers flank the upper mountain, stretching over 35 square miles. As the most heavily glaciated peak in the lower 48 states, it offers world class climbing opportunities. The mountain has also been the primary training ground for climbers who attempt tougher endurance climbs like Mount McKinley and Mount Everest.

For more than 80 years, commercial guiding has enabled many to climb to the summit of Mount Rainier. In 2001, 11,167 people participated in some kind of climbing activity, and of those, approximately 4,165 (37%) were in commercially guided parties.

Natural and Cultural Resources

Note: Additional descriptive information concerning park natural and cultural resources found in the draft Commercial Services Plan has been removed from this version. It may be found in the Mount Rainier General Management Plan, Commercially Guided Visitor Use and Other Services Environmental Assessment and Errata for this plan and in other park documents, such as the Resource Management Plan.



Commercial Services at Mount Rainier

Mount Rainier National Park authorizes commercial activities in a number of different ways, including concession contracts, special use permits, and incidental business permits. Commercial Use Authorizations will replace incidental business permits once the implementing rules for the 1998 National Park Service Concessions Management Improvement Act are completed (see box “IBPs Will Become CUAs in Appendix 3).

Are Non-Profit Organizations Considered Commercial?

For the purposes of CUAs, a service is generally considered commercial if the provider receives compensation (through money, travel expenses or the receipt of something that has monetary value). Non-profit institutions are not required to obtain commercial use authorizations *unless taxable income is derived by the institution from the authorized activity*. The general exceptions to this rule are certain commercial transportation services providing no more than on-board interpretation, and bonafide educational programs offered through accredited colleges, universities, and certain other educational institutions. Note, however, that other permits may be required even if a commercial use authorization is not. Non-profit organizations may be required to follow the same terms and conditions for managing their activities as commercial service providers. Final rules for implementing CUAs are still pending on the national level. Please see the section on Special Use Permits in Appendix 3 for more information.

Note: See Appendix 3 for explanation of the various forms of commercial services authorization instruments and for information about current commercial services in Mount Rainier National Park.

Commercial Services Plan Goals



The following goals address the desired future conditions for park commercial services. Public comments were used to further refine the general and specific goals for crafting the selected alternative from the alternatives in the draft plan. These refinements reflect ongoing attempts by park managers to provide a range of services and use levels that will ensure the protection of park resources and the visitor experience for future generations.

Additional Services

Offer a range of services that allow and encourage individuals and companies to share their knowledge of the park with visitors in a manner that does not conflict with NPS programs and policies.

Air Quality

Work toward implementing General Management Plan air quality goals by encouraging the use of shuttles. Manage the number of commercial vehicle trips in the park through the requirement that commercial employees and clients be shuttled.

Camp Muir

Continue to use Camp Muir as an overnight camp for independent and commercially guided climbing activities. Add expedition- style climbing opportunities that don't rely on fixed facilities for shelter, cooking, or water.

Carrying Capacity

Establish limits for existing commercial services that accommodate or expand use (below the current maximum potential). Authorize use levels for new services that will protect

park resources and the quality of the visitor experience. Limits would be interim until Wilderness Management Plan limits change or carrying capacity analyses give evidence of unacceptable adverse impacts to park resources and/or the quality of the visitor experience.

Commercial Bus and Van Tours

Encourage commercial bus and van tours to offer park visitors high quality information and experiences that focus on protecting park resources and values.

Commercial Business Opportunities

Create a Commercial Services Plan that provides concessioners with a reasonable opportunity to make a profit. Provide other businesses (CUAs) appropriate incidental opportunities.

Commercial Free Zones and Times

Recognize that national parks are commercial free zones, and that commercial activities and areas must be specifically designated as a result of compelling arguments.

Commercial Use Limits

Manage use to achieve GMP objectives and experiences by concentrating guided climbing in the GMP high and moderate use climbing zones. Allocate additional guided climbing and other commercial wilderness and developed area use throughout the park. Ensure that limits are flexible enough to respond to new impacts and changes in visitor experience and resource protection indicators and standards.

Communicating the NPS Mission and Core Park and Resource Values

Help commercial service providers and their clients become knowledgeable about the National Park Service's mission, park management goals, and, as appropriate, Leave No Trace principles, to ensure that they fulfill their role in protecting park resources.

Competition

Provide more choice to park visitors by increasing the number of commercial service providers and the types of services they offer.

Firewood Sales

Continue to allow (but do not expand) firewood sales until additional steps are taken toward implementing the GMP goal of reducing individual campfires in the park (through proposed redesign of campsites). Allow sales only in previously authorized campgrounds.

Gateway Communities

Encourage additional administrative and operational components of commercial services to be based in surrounding communities.

Group Size and Client Guide Ratio

Ensure that commercial group sizes are consistent with the park's existing guidelines and regulations. Establish client to guide ratios for safety and resource protection.

Guided Activities (General)

Provide a range of appropriate commercial services opportunities that minimize adverse impacts to park resources, including physical and social effects, by increasing the range of service providers as well as the range of services (type and length of trips, etc.) they provide.

Guided Alpine Wilderness (Mountaineering Training)

Provide both concession and non- concession opportunities for non- summit educational seminars, such as alpine search and rescue training. Guided alpine wilderness activities should not expand beyond current authorized areas.

Guided Climbing

Establish limits for commercially guided climbing to hold use near current levels pending further analyses. Find ways to modify use, without additional adverse impacts including visitor experience, by articulating a balance between commercial and independent use of park resources. Increase the range of opportunities for guided clients.

Guided Day Use

Expand opportunities for concession and non- concession guided summer and winter commercial day use, including day hiking, skiing, snowshoeing, bicycling and other appropriate day use activities, to increase recreational and educational opportunities for park visitors, while continuing to protect park resources.

Guided Wilderness

Provide limited commercial opportunities for guided overnight backpacking trips that focus on areas below 10,000 feet. These activities should not conflict with or take away from the large number of independent visitors engaged in the same types of activities.

High Camps

Provide for the use of high camps by guide services without diminishing the opportunities for independent visitors.

Levels of Commercial Use (Actual vs. Maximum Potential)

Define actual and potential maximum commercial use to better understand how such use may be affecting park resources and to establish commercial use limits at realistic levels.

New Commercial Services

Create a consistent and systematic method of evaluating requests for new commercial services that considers impacts on park resources and values, park operations,

management objectives, and visitor use.

Operational Feasibility

Create an operationally feasible plan that enables commercial service providers to use park areas with minimal impact to park administrative operations, resources and other visitors.

Preservation of Park Resources

Protect park resources and values from unacceptable impacts, by integrating strategies for mitigating resource impacts into the authorizations for commercial activities.

Route Maintenance

Allow climbing route maintenance appropriate to the Wilderness Management Plan zone and adopt a formal process to review proposals to determine the need for climbing route marking and other route aids.

Safety

Ensure that commercial service providers minimize risk to clients, guides and others through education, training and implementation of safe practices.

Shuttles

Provide an opportunity to foster GMP transportation planning goals by allowing commercial shuttle operations on the Westside Road and parkwide.

Single Trip Guides

Provide an opportunity for a limited number of qualified, non- concession guides to conduct climbs of Mount Rainier.

Towing

Minimize the park's role in visitor initiated towing services. Allow visitors with recreational vehicles, motorcycles and vehicles with other unique requirements, including automobile club memberships, to select towing service providers.

Visitor Experience

Ensure that commercial service operators provide high quality experiences to their clients that conform to park management guidelines and policies.

Wilderness

Create a plan that embodies the goals and ideals of wilderness preservation, including commercial use of wilderness where appropriate. Commercial use of wilderness should not increase significantly beyond existing levels.

Commercial Free Zones and Times

National parks, by regulation (36 CFR 5.3), are commercial free zones. Commercial activities, with few exceptions, must be specifically authorized by park management through a permit, contract or some other authorization (NPS Management Policies 2001). Park managers, therefore, must develop compelling arguments for allowing a commercial activity to occur. There is also an implied obligation to preserve management options for the future (by not fully exploiting every conceivable use opportunity) and to ensure that decisions made today do not restrict the park's ability to adapt to changing conditions.

Commercial free areas have been both retained and expanded in the selected alternative. The following commercial free zones and times have been established:

- Westside Alpine Commercial Free Zone: Success Cleaver clockwise to Ptarmigan Ridge (inclusive) from 6,000 feet elevation on the lower edge to 13,500 feet elevation on the upper edge.
- Tatoosh Commercial Free Zone: A low elevation commercial free area on the south side of the Wonderland Trail between the Muddy Fork Cowlitz River, westward to the Nisqually River/Eagle Peak area and encompassing the Tatoosh Range within the park. This area would be defined as the area between the Nisqually River and the Muddy Fork of the Cowlitz River, south of the Wonderland Trail and Stevens Canyon Road (whichever is further south). It would not include the Longmire Campground or administrative access road to Skate Creek Road (USFS Road 52).
- No commercial camping during July and August on the Wonderland Trail
- No commercial use on Friday and Saturday nights on the Kautz, Emmons and Liberty Ridge routes

Commercial free areas are an important component of the Commercial Services Plan. They will help ensure that commercial use does not dominate the use of the park.

Enhancing Choice through Competition

Although the National Park Service has traditionally preferred single operators for most concession services, exceptions are abundant. Exceptions include cruise ships in Glacier Bay National Park, guided mountaineering companies and air taxis in Denali National Park, river runners in Grand Canyon National Park, and river outfitters on the Ozark and Buffalo national rivers.

One of the goals for the Commercial Services Plan has been to create more choice in guided mountaineering and other commercial services for park visitors. Through the public and internal planning process, it became clear that there are a variety of climbing styles, philosophies, instructional techniques, services, and climbing ethics offered by guided mountaineering companies as well as a similar variety of styles and techniques related to offering other commercial services. A large number of public comments on the plan identified the need to address these variations. Multiple service providers, attracting market share through competition, would likely employ many different styles and techniques for their services. Mountaineering experiences might include differences in the following:

- Scheduling (varying start times or travel days);
- Pace (number of hours or days enroute);
- Party size (varying number of people below in a climbing party and the maximum and client to guide ratios);
- Food and supplies (varying services to client);
- Training (enroute or single or multiple days beforehand);
- Climbing emphasis (offering clients a variety of experiences including environmental education trips, timely achievement of the summit, expedition style climbs, etc.); and/or
- The relationship of the climb to future endeavors (training for climbs on other summits or the singular achievement of a Mount Rainier climb).

Offering park visitors a variety of guided mountaineering and other experiences would likely result in the opportunity for greater visitor satisfaction. Clients would be able to select from a variety of styles provided by different companies. This advantage was identified by public comments on the draft plan and environmental assessment. The planning process made it clear that no single program, climbing pace, route or guide service can be expected to fulfill every client's needs or expectations.

Offering three guide service opportunities on the same climbing routes will set the stage for market share competition. Concessioners, therefore, would likely focus on the objectives of their prospective clients to differentiate themselves from other guide

services to remain competitive. Potential clients could research service providers to select the company that would provide the best program to meet their individual needs. Because competitive environments lead to a greater ability to meet the needs of individual clients, visitor experiences in the park are likely to become better and result in some rate differences among service providers, furthering visitors' satisfaction with their park experience.

Past history in this park with multiple IBP holders on the Emmons Route and with multiple concessioners on Denali National Park's Mount McKinley has shown that visitor experience satisfaction may increase by offering a variety of service providers.

Conditions for Conducting Commercial Activities

This section of the plan identifies a number of conditions that will apply to all guided activities. What follows is not a complete list, but rather a list of conditions essential to understanding the plan.

General Conditions

- All commercial groups are required to follow park rules and regulations.
- Commercial groups cannot enter, travel through, or otherwise use commercial free zones. Commercial Free Zones include the Westside Alpine Commercial Free Zone and the Tatoosh Commercial Free Zone (see *Commercial Free Zones and Times* for zone boundary descriptions).
- Commercial groups are required to obtain appropriate levels of insurance (minimum levels will be prescribed in contracts, permits and other authorizations).
- Generally, no more than one commercial group can camp in any designated camp or alpine zone at one time, with the exception of Camps Muir, Schurman and the Kautz Route. No more than one Single Trip Guide group can camp in any one camp or zone.
- With the exception of trips on the Muir Route, overlapping trips by any one concessioner are not permitted. One trip must end before another trip can begin on the same route.
- The Paradise Non- Wilderness Area would have a limit of 2 commercial groups per night per zone in winter.
- To expedite entry into the park, commercial operators may be required to collect all cost recovery and entrance fees from their clients and forward the fees to the park.
- Because the ability to use designated backcountry individual or group campsites must be allocated for commercial parties (except for concessioners guiding on *Other* climbing routes), spaces would generally be reserved in advance of the opening of the public reservation system. Spaces requested after the opening of the reservation system each year would be reserved in competition with the public (commercial service providers and the public would be reserving spaces at the same time).
- Where reservations for drive- in campgrounds are needed, spaces would be reserved through the park or public reservation system in competition with the public.
- Concessioners can compete for CUAs that do not include services authorized through their concession contracts.
- Currently approved activities, if found incompatible with resource protection, visitor enjoyment, and/or visitor safety, may be suspended or terminated.

- CUA/IBP holders found in violation of the conditions on their authorizations may have their permits suspended or terminated and may be ineligible for subsequent CUA/IBP consideration.
- Concessioners found in violation of the terms of their contracts will be managed through the provisions of 36 CFR Part 51 and current NPS policies.

Resource Conditions

- Commercial groups are required to follow Leave No Trace principles and practices appropriate to their activity.
- Commercial groups are required to walk on snow whenever possible in cross-country and in alpine areas where there is no trail.
- Groups of 12 or fewer may travel and camp in cross-country zones on snow when winter regulations are in effect. Commercial groups may not travel or camp in cross-country zones in summer, unless on an established climbing access route with the appropriate authorization.
- Commercial groups will use established toilets where available. When toilets are not available, commercial groups will use the blue bag system for human waste disposal. This standard is required in both summer and winter.
- Commercial service providers are required to give their employees (working at the park) an orientation to National Park Service mission and values.
- Commercial service providers would be required to share information about the National Park Service mission and values with their clients.
- Commercial groups would have 12 or fewer guides and clients for some activities and 5 or fewer for other activities.
- Commercial groups are required to obtain climbing permits when traveling on glaciers or above 10,000 feet and must not exceed a maximum client to guide ratio of 4:1 (except for activities occurring only at Camp Muir).
- Commercial groups are required to obtain applicable permits (climbing or wilderness) for any overnight trips in the park.

Winter and Summer Seasons Defined

- For backcountry climbing and camping, summer regulations start May 15 *or* when the snow depth is less than 2 feet—*whichever is earlier*. Summer regulations end on September 30 *or* when snow depth is more than 2 feet—*whichever is later*.
- Winter regulations start on October 1 *or* when snow depth is more than 2 feet—*whichever is later*. Winter regulations end on May 14 *or* when snow depth is less than 2 feet—*whichever is earlier*.
- In the Paradise area, the same dates apply; however, the determining snow depth is 5 feet instead of 2 feet. It therefore is possible to have winter regulations and summer regulations applied at the same time in different locations in the park. For example, Paradise might have 5 feet of snow and be operating under winter regulations, but lower areas might not yet have 2 feet of snow and would still be operating under summer regulations.

Client Transportation

- To reduce traffic congestion and to maximize available parking, commercial services are required to provide in- park shuttle transportation for their clients and employees with the exception of day guides, who may travel in client vehicles.
- To ensure adequate access for independent visitors, no more than 2 commercial vehicles can be parked at a trailhead at one time (this does not include the Paradise, Longmire or the Sunrise parking lots).

Contracts for Guided Climbing

Camp Muir Management

A Camp Muir Development Concept Plan (DCP) is intended to follow the Commercial Services Plan. The Commercial Services Plan provides the following vision for Camp Muir:

- Camp Muir (non- wilderness portion) will accommodate 36 clients and guides per night (in addition to its current 74 independent spaces). Administrative activities, such as camp managers for the concessioners, and park staff are not included in this limit.
- Due to changing public health requirements, Camp Muir cannot continue to have a formal water system. Individual groups will need to melt water for their own use (likely from a designated snow collection area).
- The cook shelter/historic guide shelter may serve as a shared, unassigned facility for use by the three concessioners and the park until long term use is prescribed by the Camp Muir DCP.
- Because it cannot meet current building codes, eventually, the client shelter/storage building will likely be removed. Clients and guides will be allowed to use temporary shelters such as weather ports and tents. The Camp Muir DCP will evaluate alternatives that may include the construction of new overnight facilities and tent platforms.

Guided Climbing Concessions Contracts

Guided climbing is authorized through concessions contracts. The process for awarding a concessions contract involves issuing a prospectus, evaluating the offers received in response to a prospectus and then awarding contracts, according to processes established by the National Park Service. This process is outlined in 36 CFR Part 51. One exception to this policy is the Single Trip Guide program. The Single Trip Guides component of this plan provides a limited opportunity for qualified mountaineering guides to access the mountain on a limited basis through the use of CUAs (additional information concerning the Single Trip Guide program can be found in the next section.)

Three concession contracts will be awarded for guided climbing/mountaineering at Mount Rainier National Park. Each of the three proposed contracts would be authorized to provide unequal levels of service on the Muir corridor (and mountaineering day schools [MDS]) and equal levels of service for all other activities and climbing routes. While a determination can only be made during the contract prospectus process (36 CFR 51), the park believes that there may be a potential right of preference for one of the guided climbing contracts. The National Park Service may designate the

contract containing a potential right of preference through the prospectus process if such a right exists. If this right is determined to exist, Contract “A” would be selected as the contract carrying a preference.

General Conditions Applicable to Guided Climbing Contracts

- Mountaineering Day Schools would occur primarily in designated areas within the Paradise Non- Wilderness Area (areas would be specifically designated by the park). Other training would occur enroute during the climb.
- Commercial groups may access climbing routes only via standard approach routes and must use previously impacted campsites in alpine areas (if present).
- The park may require a certain percentage of use on the Muir Route and on *Other* Routes to occur when winter regulations are in effect (use on the Kautz and Emmons routes is already divided into summer and winter use).
- For Muir, Emmons and Kautz route and Alpine Training trips, concessioners would reserve spaces before the public reservation system opens. For climbs on *Other* Routes, concessioners would compete with the general public for reservations.
- Overnight spaces for concessioners (except for *Other* Routes) will be allotted at the beginning of each climbing season and verified daily.
- If a concessioner does not plan to use a portion of its allotment, that portion may be made available to the public (see also *Muir Route Additional Conditions* below).

Muir Route Additional Conditions

- The Muir Route includes the following specific route choices: Disappointment Cleaver and Ingraham Direct.
- A commercial group campsite would be designated on the Muir Snowfield for required use by concessioners “B” and “C” on a rotational basis. This area would not be available for independent public use. The area would accommodate up to 12 clients and guides per night.
- Use may occur during the week and on weekends.

Muir Route Camp Availability

- Muir Snowfield (designated area) (maximum 12 clients and guides per night),
- Camp Muir (maximum 36 clients and guides per night),
- Ingraham Flats (maximum 12 clients and guides per night), and
- Summit.

Emmons Route Additional Conditions

- The Emmons Route includes the following specific route choices: Emmons Glacier and Winthrop Glacier.
- Commercial groups would access the Emmons Route or Winthrop Glacier Route only via the Inter Glacier. No access is allowed via Mount Ruth.

- Start dates would be staggered on the Emmons Route in order to meet the overnight zone restrictions (only one commercial group per wilderness zone per night).
- Commercial groups may not camp on Friday or Saturday nights on the Emmons Route.

Emmons Route Camp Availability (maximum one group per camp or zone per night)

- Glacier Basin,
- Inter Glacier,
- Camp Schurman,
- Emmons Flats, and
- Summit.

Kautz Route Additional Conditions

- The Kautz Route as defined in this plan includes only the Kautz Route.
- Commercial groups would only access the Kautz Route via Paradise (leaving from Paradise). No access is permitted via Van Trump Park.
- Start dates would be staggered on the Kautz Route in order to meet the overnight zone restrictions (only one commercial group per wilderness zone per night).
- Concessioners would need to rotate use on the Kautz Route (generally two concessioners per week would have access to the Kautz Route).
- Commercial groups may not camp on Friday or Saturday nights on the Kautz Route.

Kautz Route Camp Availability (maximum one group per camp or zone per night)

- Alpine Nisqually,
- Alpine Kautz,
- Alpine Wilson (formerly Camp Hazard), and
- Summit.

Other Routes Additional Conditions

- Other Routes are defined as non- standard routes adjacent to the Muir, Emmons and Kautz routes, as well as other routes around the mountain not included in commercial free areas. Other Routes include Gibraltar Ledge, Gibraltar Chute, Nisqually Ice Cliff, Nisqually Cleaver, Nisqually Icefall, Fuhrer's Finger, Fuhrer's Thumb, Wilson Headwall, Kautz Cleaver, Kautz Headwall, Liberty Wall, Liberty Ridge, Willis Wall, Curtis Ridge, Russell Cliffs, and Little Tahoma.
- Due to the limited capacity of the Liberty Ridge climbing route and the limited window of opportunity for good conditions on this route (approximately 60 days), and to avoid conflicts with *Single Trip Guides* and independent climbers scheduling their trips, a maximum of 3 concession parties may access this route each year (one trip per concessioner).

- Commercial groups would access the Fuhrer's Finger, Fuhrer's Thumb and Wilson Headwall routes only via Paradise. No access is permitted via Van Trump Park.
- With the exception of the Liberty Ridge Route, commercial groups may camp on Friday or Saturday nights on Other Routes.

The following conditions apply to the three proposed contracts:

Activity	Concessioner "A"	Concessioners "B" and "C" (Each)
Muir Route	<p>24 clients and guides per night (maximum)</p> <p>3,336 user nights per year (maximum)</p> <p>24 clients and guides per day in mountaineering day schools</p> <p>Overnight use limited to Camp Muir</p> <p>Maximum of 12 clients and guides per party</p> <p>Maximum ratio of 4 clients per guide</p>	<p>12 clients and guides per night (maximum)</p> <p>1,668 user nights per year (maximum)</p> <p>12 clients and guides per day in mountaineering day schools</p> <p>Overnight use rotates between the Muir Snowfield, Camp Muir and Ingraham Flats</p> <p>Same as "A"</p> <p>Same as "A"</p>
Mountaineering Day Schools	<p>24 clients and guides per day (maximum)</p> <p>Maximum of 11 clients per guide</p> <p>Maximum party size of 12 clients and guides on route</p>	<p>12 clients and guides per day (maximum)</p> <p>Same as "A"</p> <p>Same as "A"</p>

Concessioners "A," "B," and "C"

Concessioners A, B and C as identified above would each also have the ability to lead trips on the Emmons, Kautz and Other Climbing Routes, as well as to conduct alpine training and to lead day and overnight guided winter wilderness trips subject to the restrictions noted below.

	Emmons Route (Each)	Kautz Route (Each)	Other Routes (Each)
Maximum summer season	120 clients and guides	80 clients and guides	40 clients and guides per year
Maximum winter season	40 clients and guides	40 clients and guides	
Maximum number per party	12 clients and guides	Same as Emmons	5 clients and guides
Maximum ratio	4 clients per guide	Same as Emmons	Same as Emmons
Number of trips	1 trip per week	2 commercial parties per week (rotated amongst 3 concessioners)	N/A
Maximum number of nights per trip (generally)	3 nights	3 nights	7 nights except for Liberty Ridge

Alpine Training

The following limits apply:

- 12 clients and guides per party (maximum);
- 4 trips per year (maximum);
- 4 nights per trip (maximum); and
- 4 clients per guide (maximum).
- These are non- summit experiences that will occur below 10,500 feet and are geared toward skills enhancement.
- All camping would take place on snow and ice.
- Groups may use Alpine Winthrop, Alpine Paradise (Paradise Glacier) and Alpine Nisqually (Nisqually Glacier) zones.
- Use may occur during the week and on weekends.

Guided Winter Day Use Activities (skiing, snowshoeing and related activities)

The following limits apply:

- 12 clients and guides per party (maximum);
- 5 clients per guide (maximum);
- 20 trips per winter season (maximum); and
- 1 trip per day (maximum).

Guided Winter 5-Night Trips

The following limits apply:

- 12 clients and guides per party (maximum);
- 5 non- summit trips per winter (maximum);
- 5 nights per trip (maximum);
- 4 clients per guide if glacier travel is involved (maximum);
- 5 clients per guide if there is no glacier travel (maximum); and
- 4 consecutive nights in any one management zone (maximum - generally).
- These are non- summit experiences that will occur below 10,500 feet (activity can occur at Camp Muir).

Guided Winter 14-Night Trips

The following limits apply:

- 12 clients and guides per party (maximum);
- 2 non- summit trips per winter (maximum);
- 14 nights per trip (maximum);
- 4 clients per guide if glacier travel is involved (maximum);
- 5 clients per guide if there is no glacier travel (maximum); and
- 4 consecutive nights in any one management zone (maximum - generally).
- These are non- summit experiences that will occur below 10,500 feet (with the exception of activity at Camp Muir).

Commercial Use Authorizations for Single Trip Guides - 6 to 18 CUAs

Mount Rainier is widely recognized as one of the best places in North America to train for longer and more difficult climbs in Alaska and abroad. The purpose of Single Trip Guide CUAs would be to enable uniquely qualified national and international climbing guides to bring their clients to Mount Rainier for a one- time trip.

The introduction of Single Trip Guiding opportunities is a new concept at Mount Rainier National Park. For this reason, the program is considered to be experimental and will be subject to a phase- in period. Adjustments may also be made as the program is implemented. The park reserves the right to review and modify the components of this program and to terminate the program if conditions warrant.

Certification Requirements

Mount Rainier National Park will require one of the following certifications for guides applying for Single Trip Guide Commercial Use Authorizations (CUAs) or Incidental Business Permits (IBPs):

- American Mountain Guiding Association (AMGA) Alpine Guide Certification;
- AMGA Ski Mountaineering Guide Certification;
- IFMGA (International Federation of Mountain Guides Association) a.k.a. the UIAGM (*Union Internationale des Associations de Guide de Montagne*) Guide Certification (full guide); or
- Equivalent, documented training and experience as determined by the park.

The park has reviewed the technical guiding requirements for these certifications and has deemed the requirements for each level of certification adequate for the hazardous terrain encountered on Mount Rainier. This includes the ability to move safely with clients on glaciated, heavily crevassed terrain, and to lead clients through areas of steep snow, ice and rock steps of low fifth class difficulty.

The park considered the acceptance of these organizations within the guiding community before making this determination. The following provides a brief overview of each organization:

- The AMGA is currently operating in its 25th year. While not the sole association of mountain guides in the U.S., they enjoy the largest membership and are the only American association with membership in the IFMGA.
- AMGA certification requirements are currently recognized for guides at two national parks (Rocky Mountain National Park and Joshua Tree National Park) and will soon be recognized at another (New River Gorge National River).

- The IFMGA has been the most well respected international association of mountain guides since its inception in 1966. Full member organizations of the IFMGA now exist in Austria, Canada, France, Germany, Great Britain, Italy, Japan, New Zealand, Norway, Peru, Slovakia, Slovenia, Spain, Sweden, Switzerland, Poland, and the USA. Only IFMGA certified guides from full member organizations will be allowed to participate in this program.

First aid requirements are incorporated into the suggested guide certification requirements. All AMGA certified guides are required to have current Wilderness First Responder certification and all IFMGA member organizations require "...an acceptable level of first aid training..." (from IFMGA certification guidelines) for their guides before IFMGA certification status is obtained. Copies of current emergency medical certifications will need to be presented to the park as part of the single trip guide application evaluation process.

Finally, the park has considered the need for Leave No Trace (LNT) training and has reached the following conclusions:

- The AMGA builds LNT material into all levels of their courses and examinations. Certified Alpine Guides and Certified Ski Mountaineering Guides will necessarily have had significant exposure to LNT principles through their coursework and will likely also have had significant field experience incorporating LNT practices. AMGA guides will be provided with information on the specifics of Mount Rainier National Park's policies as part of the application process, but the guide can be expected to possess a satisfactory familiarity with LNT principles.
- A small number of IFMGA guides are likely to be unfamiliar with certain LNT principles. Rather than use what is largely a cultural difference as a limiting criteria for these guides, the appropriate comprehensive information will be shared with IFMGA guides (a pamphlet from the LNT organization and additional material covering the specifics of Mount Rainier National Park policies) along with a clear warning of the consequences of ignoring park rules and policies.

Certification Requirement Clarifications

- The lead guide for all single trip CUA activity at the park must have the required certification. Assistant guides accompanying the lead guide are not required to be certified.
- Company accreditation and guide certification are different. The single trip guide CUAs or IBPs will only be issued to certified guides as defined in this plan. Accredited guide services will only be eligible to participate in this program if the lead guide on the expedition/trip is certified (as defined in this plan).
- The park may amend the qualifications requirement at a future date as circumstances warrant.
- Previous guiding experience on Mount Rainier will not be a requirement for obtaining a single trip guide permit.

Consideration was given to reviewing all individual climbing resumes from single trip guide applicants. However, this laborious task would significantly increase the administrative cost for this program. For this reason, the park has elected to primarily utilize existing, nationally and internationally recognized certification programs to screen permit applicants. Because this program is experimental in nature, this decision will be reviewed and may possibly be amended in the future.

Conditions Applicable to Single Trip Guide CUAs

18 Single Trip Guide CUAs (phased- in over 3 years) could be granted. Each may guide:

- 1 group per permit (maximum of 1 permit per entity per year);
- 5 clients and guides per party (maximum);
- 5 nights per trip (maximum);
- 4 clients per guide (maximum);
- Trips on any route outside the Commercial Free Zone (including guiding the Muir, Emmons and Kautz Routes); and
- Trips Sunday through Thursday (no Friday or Saturday night stays).

Single Trip Guides must have:

1. American Mountain Guide Association (AMGA), IFMGA certification or equivalent (as determined by the park);
2. Wilderness First Responder or equivalent certification; and
3. Leave No Trace certification or knowledge.

Single Trip Guides cannot be employed by a concessioner at the time of their trip and may not be Mount Rainier National Park guided mountaineering concessioners.

Due to the limited capacity of the Liberty Ridge climbing route and the limited window of opportunity for good conditions on this route (approximately 60 days), and to avoid conflicts with concession and independent climbers scheduling their trips, a maximum of 2 (of the 18) Single Trip Guide parties may access this route each year.

Commercial Use Authorizations (CUAs) for Guided Wilderness

Guided Overnight Wilderness Use (Summer) – 5 CUAs

Most trails are available for commercial use with certain seasonal restrictions (see also Commercial Free Zones). Guided wilderness would be managed through five CUAs. Each of the five CUAs would be permitted to guide one group of 12 or fewer in summer. Trip dates would be set in advance.

This commercial use opportunity would offer visitors desiring a guided backpacking trip the greatest choice of commercial service providers rather than the greatest choice in the types of trips. Trips on the Wonderland Trail would only be available before July and after August to avoid the peak period of independent visitor demand (which currently exceeds camp availability during July and August).

Conditions Applicable to Guided Wilderness (Summer)

Each of the five CUA holders would be allowed to guide:

- 1 trip (maximum);
- 5 nights (maximum);
- 12 people per party (maximum); and
- 5 clients per guide (maximum).

Guided Wilderness (Summer) CUAs would be able to:

- Camp with groups of 5 or fewer in individual campsites or with groups of 6 or more in group campsites (no split parties);
- Camp in non- Wonderland Trail sites any time in summer;
- Camp up to one night in the same Wonderland Trail Camp (no repetitive use); and
- Camp during the week (no Friday or Saturday night stays allowed).

Guided Wilderness (Summer) CUAs would not be able to:

- Camp or travel in cross- country areas; or
- Stay overnight in Wonderland Trail camps during July or August.

Guided Day and Overnight Wilderness Use (Winter) – 2 CUAs

This activity combines day and overnight winter season use. It is divided among concessioners (as described in the *Contracts for Guided Climbing* section above) and CUAs and also includes winter ski touring activities that would continue to be provided by the current concessioner holding contract CC- MORA002- 88 (hospitality services).

As is noted below under the guided day use activity section, the concessioner holding

contract CC- MORA002 has a right of first refusal for activities listed in their contract. There is an exception to this provision for services provided by other concessioners.

Guided Wilderness Use (Winter) activities are not intended to involve summit attempts and will, with the exception of Camp Muir activities, occur below 10,500 feet elevation to separate the execution of this activity from guided climbing. Activities will occur in the winter (as defined above in *Conditions for Conducting Commercial Activities*).

Conditions Applicable to Guided Wilderness (Winter):

Two CUAs which each include the following limits will be issued.

Guided Wilderness Use (Winter) Includes the following activities:

- **Guided Winter Day Use (skiing, snowshoeing, etc.)**

The following limits apply:

- 12 people per party (maximum);
- 20 trips per season (maximum);
- 1 trip per day (maximum); and
- 5 clients per guide (maximum).
- Note: Due to contractual agreements with Guest Services, Inc., CUA guided skiing and snowshoeing trips cannot currently occur within a ¼ mile radius of the developed areas at Paradise and Longmire. The developed zone is identified on park maps and encompasses park and concessioner operated structures. This restriction precludes using CUAs to authorize this activity in the areas noted above.

- **Guided Winter 5-Night (Maximum) Trips**

The following limits apply:

- 12 people per party (maximum);
- 5 trips per winter (maximum);
- 5 nights per trip (maximum);
- 4 clients per guide (maximum); and
- 4 nights per wilderness zone (5 nights okay at Camp Muir) (maximum).

- **Guided Winter 14-Night (Maximum) Trips**

The following limits apply:

- 12 people per party (maximum);
- 2 trips per winter (maximum);
- 14 nights per trip (maximum);
- 4 clients per guide (maximum); and
- 4 nights per wilderness zone (maximum generally).

Commercial Use Authorizations (CUAs) for Additional Services

A number of “Additional Services” that do not fall under the other categories above are also authorized in this plan. These Additional Services include Day Use Activities (Road Tours, Day Guiding, Westside Road Bicycling and, Photography and Art Courses), Overnight Activities (Drive- In Campground Use and Guided Bicycling) as well as Shuttles.

DAY USE ACTIVITIES

Because of the moratorium (see Appendix 3), limited data exists on the potential impacts of commercial day use. Therefore, the limits specified below should be considered experimental in nature and subject to change pending monitoring during implementation. These experimental limits for activities were established based on the following general criteria:

- A larger number of CUAs (10) would be issued when activities can occur over a large area (dispersed activity) or if the activity is likely to have negligible adverse impacts on park resources or visitor experience.
- A smaller number of CUAs (5) would be issued when activities would occur in a smaller area or where activities could have a higher level of impacts on park resources or visitor experience.
- Enough opportunities are offered to allow a range of service providers.

Road Tours

Road tours are driving tours that may involve limited guiding experiences outside the vehicle. These experiences may include short, incidental walks/hikes of generally no more than one mile (one- way) away from the vehicle. Because the park recognizes the benefits of encouraging visitors traveling on common carriers to leave their vehicles and to experience the park, CUAs/ IBPs will not be required for this activity.

It is the park’s intention to work towards providing road tour operators with an opportunity to have trained interpreters (NPS, private guides, etc.) available to travel with their clients during visits to the park. One of the park’s goals is to ensure that visitors receive accurate and complete resource protection and other information during their park visits.

Road tours would therefore not require an IBP/CUA, unless required by NPS policy at a future date, and would be considered part of the commercial tour bus activity. Road tours would be charged the commercial tour entrance fee.

Road Tour groups may:

- Take hikes/walks up to 1 mile in length (one way);
- Travel in staggered groups of 12 or fewer (recommended) with no group exceeding 15 people (maximum). Larger groups or groups without guides would need to disperse to reduce congestion on trails.
- Lead group hikes/walks in the following areas as long as they do not interfere or compete with NPS programs (list is subject to change):
 - Kautz Creek
 - Longmire (including Trail of the Shadows, Historic Walking Tour and Longmire Campground but not including the commercial free Eagle Peak Trail)
 - Christine Falls
 - Narada Falls (to falls viewpoint)
 - Paradise (including Nisqually Vista Nature Trail, Glacier Vista Trail and other lower meadow trails)
 - Reflection Lakes (not including the commercial free Pinnacle Peak Trail)
 - Box Canyon Overlook /Trail
 - Grove of the Patriarchs
 - Ohanapecosh (including visitor center, Silver Falls Loop Trail and Hot Springs Nature Trail)
 - Sunrise
 - Tipsoo Lake
 - Mowich Lake (including the Lakeshore Trail)
 - Twin Firs Nature Trail
 - Carbon River (including Rain Forest Nature Trail, Chenuis Falls and Ipsut Creek trails)
 - White River (including White River Picnic Area Nature Trail)

Day Guiding (Guided Day Hiking and Step-on Guides) – 10 – 20 CUAs

This category includes professionally guided day use activities. In the draft Commercial Services Plan, it was broken into two parts (Summer Guided Day Hiking and Step-on Guides) that required separate permits. It is combined here to decrease the overlap in the categories and in administrative management that became apparent during public review. Similar to Road Tours, the goal of Day Guiding is to provide groups with trained interpreters/guides to enhance their visit to the park while avoiding conflicts with NPS sponsored programs. Trained guides can help provide visitors with accurate information while ensuring that park resources are protected.

Although any business may apply for this CUA, the park envisions local hotels/inns, and individuals with exceptional levels of knowledge of the park, as being the likely service providers. Guides may either organize their own group of clients or offer their services to groups organized by bus tours or other businesses.

A. Guided Day Hiking: This activity includes guides who accompany clients on trails generally for a distance of more than 1 mile (one way). Day guiding may occur anywhere

in the park as long as it does not conflict with NPS- sponsored programs. Each CUA holder may guide:

- 40 groups per summer (maximum);
- 12 people per party (maximum);
- 5 clients per guide (maximum) recommended;
- 1 trip per day (can include multiple locations with the same group); and
- This activity is authorized to occur in the summer, however it may continue past September 30 until winter regulations are in effect.

B. Step-On Guides: This activity includes guides who can be hired by road tour operators to provide guide services and who would likely conduct either on- board interpretation or out of vehicle walks (of 1 mile or less one way). Step- on Guides may use the same areas noted in the Road Tour section, subject to the same restrictions. Each CUA holder may guide:

- An unlimited number of groups per year;
- 11 clients per guide (maximum) recommended;
- Multiple trips per day if conducted by multiple guides under a single CUA; and
- Year round in areas open to public vehicles.

Additional Issues Applicable to Day Guiding (Guided Day Hiking and Step-on Guides)

- Although 10 CUAs would initially be offered for Day Guiding, the number may later increase to 20 (to accommodate the 10 proposed for each activity in the draft plan).
- The NPS may develop, and require day guide participation in, a certification program to ensure that accurate interpretive and safety information is provided to guided visitors.

Westside Bicycling Tours – 5 CUAs

This activity is appropriate for areas where shuttle only driving access occurs (currently proposed only for the Westside Road). If the Carbon River Road is later permanently closed to general public vehicle access as a result of major flooding, shuttle and bicycle access to Ipsut Creek Campground may also occur.

Five CUA Holders may each lead:

- 1 group per week (maximum);
- 12 people per party (maximum); and
- 11 clients per guide (maximum).

If conflicts occur in the use of the road for bicycling tours, the following may occur:

- Additional permit conditions may be developed;
- The number of CUAs may be decreased; and/or
- Schedules may be developed for groups accessing the road(s) (times, dates, etc.).

Photography and Art Courses – 5 CUAs

This is an interim offering that will likely be replaced by an institute program if a Mount Rainier Institute is developed. This program is also offered experimentally to allow the park to assess the compatibility of photography and art classes with other trail and vista use. The paramount concerns include:

- Ensuring that off- trail use does not occur; and
- Ensuring that classes do not obstruct other visitors' ability to stay on trails or to use overlooks.

Five CUA holders may each lead:

- 1 group per week (maximum);
- 12 clients per party (maximum); and
- 5 clients per guide/instructor (maximum) recommended.

OVERNIGHT ACTIVITIES

Commercial Use of Drive-in Campgrounds – 10 CUAs

Groups conducting extended road tours frequently seek campgrounds in national and state parks for overnight use. Commercial groups have been using the park's drive- in campgrounds for many years.

Ten CUAs would be issued and may use:

Cougar Rock Campground

- 2 out of 5 group sites, Sunday through Thursday nights;
- 1 out of 5 group sites, Friday and Saturday nights; and
- Sites would be reserved in competition with the public.

Ohanapecosh Campground

- 1 out of 1 group site Sunday through Thursday nights; and
- Site would be reserved in competition with the public.
- Note: Although a second group site may be constructed at Ohanapecosh, only 1 site would continue to be available for commercial groups.

Ipsut Creek Campground

- 1 out of 2 group sites Sunday through Thursday nights; and
- Site would be available on a first- come, first- served basis.
- Note: The General Management Plan calls for Ipsut Creek Campground to be closed to vehicles in the event of a major road washout.

Other Issues Applicable to Commercial Use of Drive-in Campgrounds

- Problems have been encountered tracking this activity through the national reservation system used by many units of the National Park System.

- If the national reservations contractor is unable to develop a system to track this activity, commercial operators could be required to book their sites through the park.

Guided Bicycling – 5 CUAs

Guided/facilitated commercial bicycling has occurred in Mount Rainier National Park for many years. Tour leaders frequently operate a support van and make overnight and food arrangements for their clients. The tours usually involve trips that merely pass through Mount Rainier National Park with the park being one of many stops along the way. Trips have frequently included an overnight stay at one of the park inns.

Five CUAs may each lead:

- 2 groups per year (maximum); and
- 12 people per party (maximum).
- From May 15 through September 30, road conditions permitting, cycling trips could take place within the park between Tuesday and Thursday.
- From October 1 through May 14, road conditions permitting, cycling trips could take place Monday through Friday.
- Trips would be scheduled in advance and are subject to park approval.

Other Issues Associated with Guided Bicycling

Park roads were not designed for multiple uses. Roads are narrow, with few pull-outs, many blind curves, and virtually no passing zones.

OTHER ACTIVITIES

Shuttles - 10 CUAs

Issues Applicable to Interim Commercial Services Plan Shuttle CUAs:

Because the Commercial Services Plan is not meant to serve as a transportation plan, only small steps would be taken toward achieving the transportation goals outlined for shuttles in the 2002 General Management Plan. Due to continuing questions about viability and profitability, shuttles have remained CUAs.

The CUA shuttles would generally need to start and end operations outside the park boundary due to a \$25,000 income limit imposed by the 1998 Concessions Management Improvement Act for activities occurring within the park boundary.

Because shuttle services generally require a business model that allows them to provide services over a longer period of time than a CUA would allow (two years), a large number of permits would initially be available. There is no right of renewal for CUAs which results in no assurance that a CUA holder would be able to obtain a permit for the same service in the future.

The ideal future shuttle model, therefore, will likely involve authorization through a concessions contract if the service is found to have a reasonable expectation to achieve a profit. If there is no reasonable opportunity to achieve a profit, then it is likely that some sort of subsidy would be required, with the service being authorized through a cooperative agreement or under a procurement of services contract outside the commercial use process.

After further study, it may become apparent that the service can be provided profitably through a creative solution such as using concessioner- owned vans and buses for shuttle services during periods of low demand. A major challenge noted in early shuttle transportation planning studies will be to locate suitable parking areas to stage visitor vehicles, to manage multiple destination drop- off/pick- up locations, and to find ways to entice visitors to trade the use of their cars for a ride in a shuttle.

As noted above, the number of CUAs authorized for this activity is high. The relatively large number of CUAs reflects the park's desire to accommodate the foregoing challenges by:

- Providing a reasonable opportunity for CUA holders to obtain successive permits to operate in the park; and
- Providing enough opportunities so that potential operators in a variety of gateway communities can experiment with offering this service.

Ten CUAs may each offer shuttle services subject to the following conditions:

- Administrative CUA fees would be waived.
- CUA holders may provide scheduled service and/or non- scheduled, reservation only service anywhere in the park.
- 1 of the 10 CUA holders may also operate on the Westside Road (selected through the permit application process).
- Shuttle vehicles and drivers must be appropriately licensed and registered to operate in Washington State.

Towing

Towing services have traditionally been required to obtain Incidental Business Permits to provide services in Mount Rainier National Park. After the publication of the draft Commercial Services Plan it was decided to invoke the superintendent's discretionary authority to allow emergency services, such as towing, to operate in the park without a commercial authorization (36 CFR 5.6). Incidental Business Permits (IBPs) or Commercial Use Authorizations (CUAs) will be required to provide towing services at the park. Towing services will be required to be licensed by Washington State and must notify the entrance station personnel (when available) of the nature of their visit when they enter the park. This will enable visitors to continue directly contact towing companies for emergency services.

Appendix 1:

4-Step CUA / IBP Evaluation Process for New or Expanded Services

Mount Rainier National Park will use a four-step process to review and analyze proposals for activities that would require new or expanded commercial use authorizations (CUAs), soon to replace incidental business permits (IBPs). The Commercial Services Planning Team designed these procedures to provide a consistent and fair evaluation of all requests. Primary consideration will be given to the potential effect of the proposed activities on park resources and non-commercial visitor activities.

Which Activities Require the 4-Step IBP/CUA Evaluation Process?

If an applicant wants an authorization for a new kind of IBP/CUA activity, or wants to make significant changes to a previously approved IBP/CUA activity, or if some aspects of a new activity have not been evaluated before, the four-step review will be necessary. Some additional review may also be required, including compliance procedures outlined for the National Environmental Policy Act in NPS Director's Order 12.

Which Activities *Don't* Require the 4-Step Evaluation Process?

Appropriate IBP/CUA Activities

Guided Day Hiking
Photography Walks
Bicycling Tours
Guided Backpacking
Road-based Tours
Shuttle Services
Educational Experiences
Step-On Guides
Mountaineering Training
Single Trip Guides
Guided Ski/Snowshoe Touring
Guided Mountaineering

Applicants seeking IBPs/CUAs for activities already approved through this plan (see box) do **not** need to go through this evaluation process as long as the activity will be occurring in a manner previously approved by the park, including level of use, location, number of clients and guides, etc.

If the proposed activity is determined to be a **special park use** (commercial filming, non-commercial group activities, etc.), Mount Rainier National Park will forward a special use permit application to the applicant. Except for IBPs/CUAs, the review of special park use activities is outside of the scope of this plan.

If the proposed activity is determined to be that which normally requires a concession contract, the review process will be accomplished according to the regulatory process at 36 CFR Part 51.

The Four-step Evaluation Process

Applicants must apply for a CUA/IBP in writing to the park. The applicant must include the administrative fee with the application. A fee schedule will be developed after the publication of the plan and will be adjusted as needed to allow for recovery of the cost for the park's staff time to process the application. The application fee will be non-refundable. Other fees may apply as noted in subsequent paragraphs below. After a completed application is received, the following steps will be followed.

Step 1: Initial Screening

A park management interdisciplinary team will review every written proposal to determine whether or not the four- step process is required. Next, they will determine which kind of authorization is most appropriate. Is the new activity a potential IBP/CUA, or a concession? If the activity is determined to be more appropriately reviewed as a concessions operation, an evaluation will be made through the provisions listed under the concessions regulation (36 CFR 51) rather than through this four step process.

Step 2: Evaluation

An evaluation form will be used to apply legal standards, recreation potential, resource impacts, effect on management, and other factors derived from the park purpose, significance, and desired future conditions.

If environmental analysis is required to complete the evaluation, costs for compliance with the National Environmental Policy Act (NEPA) may be borne by the applicant. Costs may include surveys, specialist staff time, contractors, and administrative work. The amount would depend on the complexity of the proposal, and could range from minimal to well over \$40,000.

All proposed new commercial activities reviewed through this process must provide appropriate visitor services that:

- Cannot be adequately met outside the park boundary;
 - Do not include capital improvements within the park boundary;
 - Create no unacceptable impacts on natural, cultural and aesthetic resources or park values;
 - Create no unacceptable impacts on visitor experience, such as increased use in crowded or congested areas;
 - Incorporate measures to ensure safe visitor experiences;
 - Include an educational component appropriate to the activity;
 - Provide and document staff training for quality educational services;
 - Comply with applicable federal, state and local laws, rules, codes and regulations;
- and

- Comply with Mount Rainier National Park policies as outlined in management documents such as the General Management Plan, Strategic Plan, Commercial Services Plan, Resource Management Plan, Wilderness Management Plan, and other plans or studies that currently exist or that might exist in the future.

3. Decision

The superintendent will make the final decision as to whether or not the activity should be authorized, based on the evaluation process. Due to the complexities of some proposals and the limited amount of staff time that can be dedicated to the review process, an application for a new or expanded IBP/CUA service may require a year or more to review depending on the level of potential impact.

4. Applicant Notification

For IBP/CUA applicants, an acceptance letter and completed permit would be sent to the applicant for signature if the activity is approved. The permit must be signed, returned to the park; and the applicant must submit all required documentation, providing proof of liability insurance with the National Park Service listed as an additional insured party (or the insurance carrier may waive the right of subrogation against the United States Government); and remit any additional required fees (monitoring fees). Only after the superintendent signs the permit is the activity authorized. Commercial services staff would also send applicants written notification if they are denied permits, and would explain why the application was denied. Fees for reviewing proposals would not be returned.

Additional Considerations

Land Requirements

IBPs/CUAs do not usually authorize land or facility assignments. IBPs/CUAs do not provide an authority to construct facilities or improvements on federally owned land. Use of park land and facilities for commercial activities is typically authorized by concession contracts and special use permits. If facilities are needed for the business to operate, the proposal will be reviewed through the concessions process.

Support Facilities / Services

Many commercial activities require support facilities and/or services, such as parking spaces, restrooms, changing rooms, and picnic areas. Such support activities have an impact on park budgets, staff, independent visitors, and facilities. When the demand for commercial services exceeds the supply of support facilities and services, park management may either request a modification of the activity, or deny the proposed commercial activity.

Staffing Needs

The process of monitoring individual commercial use authorizations and concession contracts will be examined to determine National Park Service staff requirements. The amount of staff time required is often dictated by the complexity of the operation and the potential impact on resources. To assess the amount of staff time for processing an application, for the evaluation and approval process, and subsequent authorization and monitoring requirements, the following definitions of complexity will apply:

High – Successful monitoring of the activity will include annual administrative review, permit compliance reviews, and onsite contact, whenever possible, with the operation when the activities are occurring.

Medium – Successful monitoring of the activity will include annual administrative review, and intermittent permit compliance reviews and onsite contact with the operation.

Low – Successful monitoring will include annual administrative review, permit compliance review and an onsite review of the areas utilized for the activity. Contact with IBP/CUA holders may or may not occur during scheduled activities.

Commercial operators, at a minimum, will bear the expense of management and administrative costs for these activities on a cost recovery basis. Costs (application/administrative and management/monitoring costs) to IBP/CUA holders will be noted on a fee schedule. A list of administrative and management fees will be developed and updated annually for each activity once the plan is implemented.

Other Issues

Local situations and conditions that are not anticipated will be identified on a case- by- case basis. These issues might include the effects of proposed activities on neighboring communities, agencies, organizations, individuals and park partners. They might also include unforeseen and adverse cumulative effects caused by new commercial services along with already approved services.

Appendix 2:

History of Commercial Services at Mount Rainier

- 1900** The Longmires, a pioneer family, develop the Longmire Springs area and build a guesthouse, barn, storehouse, and numerous bathhouses.
- 1903** John Reese opens a “tent hotel” above Paradise Valley. He charges guests \$10 for a week’s basic accommodations. Guides are furnished at extra expense.
- 1905** The Longmire family faces competition when the Tacoma Eastern Railroad is granted a lease to build a new hotel, the National Park Inn, adjacent to the Longmire’s private property. Robert Longmire opens a saloon, which is quickly closed by the park’s Superintendent.
- 1914** Roy Longmire is granted permission to operate an “automobile for hire” in the Longmire Springs area. Automobile traffic within the park increases.
- 1916** The Rainier National Park Company (RNPC) is formed by Puget Sound businessmen in March and is granted a 20- year “preferential concessions lease” by the newly established National Park Service. Construction of the Paradise Inn begins in the summer.
- 1919** The RNPC allows an exception to their commercial control by allowing an automobile service station to be constructed in the Longmire Springs area by the Standard Oil Company.
- 1931** A caravan of 300 cars containing the press and public officials makes the drive up the newly constructed road to Yakima Park, now known as Sunrise. The lodge, rental cabins and other buildings are still under construction. It is hoped that with some planning the site will help reduce over- crowding at Longmire and Paradise.
- 1934** Paradise becomes the winter playground of the northwest. The first annual Silver Skis Championship brings nationwide attention to Mount Rainier winter sports. The community building and kitchen are open for those who cannot afford the RNPC facilities.
- 1939** The National Park Service purchases all 18.2 acres of the Longmire property for \$30,000. Construction begins on a new ski lodge at Paradise.
- 1944** Financially distressed, the RNPC sells their rental cabins at Paradise and Sunrise. The cabins are moved out of the park and used for war industry employee housing.

- 1950 A third ski area opens at Canyon Rim. RNPC provides lunch service, car chain rental, and ski equipment rental at Longmire.
- 1951 Lou and Jim Whittaker begin guiding on the mountain.
- 1966 The Paradise Visitor Center (later renamed the Henry M. Jackson Visitor Center) opens in September, and includes a gift shop and food service.
- 1968 Rainier Mountaineering, Incorporated (RMI), started by Lou Whittaker and Jerry Lynch, begins commercial operations.
- 1971 The RNPC sells its concessions interest to Government Services, Incorporated (later Guest Services, Incorporated).
- 1975 After operating under a series of permits, RMI gets its first five- year guide service concessions contract. No qualifying offers are received to operate the ski tow for the first time since the late 1920's due to several years of high snows and growing competition from other nearby ski areas.
- 1976 GSI discontinues firewood sales at most campgrounds. Another vendor is permitted to provide this service.
- 1979 GSI discontinues the sale of gas at Sunrise.
- 1986 RMI becomes the first guide service and climbing school to receive American Mountain Guide Association (AMGA) accreditation.
- 1987 Guest Services, Incorporated is awarded a 25- year contract.
- 1993 Standard Oil discontinues the sale of gasoline at Longmire. Transportation Feasibility studies begin.
- 1994 Following significant controversy, the historic Sunrise Lodge is proposed for demolition and replacement because of its deteriorating structural condition.
- 1998 **Passage of the Park Service Concessions Management Improvement Act (PL 105-391).** The Superintendent issues a moratorium on new Incidental Business Permits beginning March 25th; no new IBPs can be awarded and current levels are frozen.
- 1999 Mount Rainier National Park celebrates its 100th Anniversary on March 2nd.
- 2002 The General Management Plan is completed and will guide management decisions over the next 20 years. Public scoping begins for this Commercial

Services Plan.

2003 The Commercial Services Plan is released for public comment. Approximately 1,900 written comments are received.

Appendix 3: Types of Commercial Use and Mount Rainier National Park Current Conditions

Concession Contracts

A business which is awarded a contract to provide commercial services within a National Park is called a concessioner. Before a concession contract can be granted, the National Park Service must, through a planning process, deem the proposed activity both “necessary and appropriate” for the public use and enjoyment of the park. The use must be consistent to the highest practical degree with the preservation and conservation of the park’s resources and values.

Necessary and appropriate activities often include a vital visitor service, such as lodging or food. Contracts generally *require* a business to provide certain services, whereas other types of authorizations (such as CUAs) merely *allow* businesses to provide a service.

Concession contracts are usually awarded through a competitive process. A contract term, under current policy, is generally 10 years (depending on the terms and conditions of the contract).

Contracts generally include an operations plan, maintenance agreement, risk management plan, an environmental management plan, and in many cases a building improvement program. Concessioners are assessed a franchise fee for the privilege of conducting approved commercial services as identified in a concessioner contract. The superintendent approves rates and charges for services based generally on comparisons within the competitive market.

The 1998 National Park Service Concessions Management Improvement Act (PL 105-391) provides a right of preference to contract renewals under certain circumstances. Current outfitter and guide services, and operations that have projected annual gross receipts of less than \$500,000, generally have a right of preference for contracts (see 36 CFR Part 51).

Three categories of concession contracts have been developed as a result of the 1998 Act. Category I contracts are used when capital improvements are required or allowed on park lands. Category II contracts are used when a concessioner is assigned land or facilities, but no capital improvements are allowed. Category III contracts will be used when concessioners are not assigned land or facilities and may not construct capital improvements.

Concession Authorizations

Currently, Mount Rainier National Park has two large and one small concession contracts agreement. Services provided through concessions contracts include:

- Overnight lodging,
- Food and beverage service,
- Retail/gift sales,
- Guided mountaineering,
- Winter day use and equipment rental (snowshoes and skis),
- Cross- country ski lessons, and
- Firewood sales.

Guest Services, Incorporated provides overnight accommodations, food services, gift shops, firewood sales (Cougar Rock), equipment rental (ski and snowshoe) and cross- country ski instruction under a concessions contract. GSI operates the National Park Inn at Longmire, which offers 25 rooms and is open year round. GSI also operates the Paradise Inn at Paradise, which has 118 rooms and is open from mid- May to early October.

Both inns offer full service restaurants. Snack bar style dining is provided at Sunrise (summer season), the Jackson Memorial Visitor Center at Paradise (year round with seasonal hours), and at the Paradise Inn (summer). Gift shops are located at the Jackson Memorial Visitor Center, Paradise Inn, and at Sunrise. Additionally, GSI operates the Longmire General Store. Firewood is sold by GSI at the Cougar Rock Campground and at the General Store. The concessioner also houses employees within the park and at its Ashford complex.

No alternative management strategies have been developed for GSI's services. Their contract expires in 2012, and therefore is not being evaluated in this plan.

Rainier Mountaineering, Incorporated (RMI) operates under a concession contract providing guide services to park visitors on Mount Rainier. RMI guides on the Muir Route and is allowed to guide on all other routes, except for the Emmons Route. In addition to summit climbs, RMI offers climbing seminars, snow and ice schools, day and overnight hiking trips, avalanche seminars, and other skills courses. RMI was formerly assigned space in the Guide House at Paradise, but now operates out of privately owned facilities outside of the park's southwest boundary in Ashford, Washington. At Camp Muir, Rainier Mountaineering operates a wood bunkhouse for clients and guides, a kitchen, and a snow melt water system. The contract with RMI expired in 2001 and has continued to be extended pending completion of this Commercial Services Plan and a subsequent prospectus. Until the plan is approved, the park will continue to take necessary measures to avoid interrupting services for park visitors.

John P. Squires, Sole Proprietor currently holds a concession authorization to provide bundled firewood and kindling at Ohanapecosh and White River Campgrounds. Mr. Squires is also operating under a contract extension.



Incidental Business Permits / Commercial Use Authorizations

Incidental business permits (IBPs) are currently used for small scale business activities that begin and end outside the park, such as some climbing services, guided wilderness providers, towing operators and shuttle buses.

The 1998 Act created a framework for a new kind of authorization instrument called a commercial use authorization (CUA). CUAs will replace the current incidental business permits (IBPs). They may be issued to private persons, corporations, or other business entities to provide certain services to visitors. Subject to the implementation of final rules, such commercial operations must either not generate annual gross receipts in excess of \$25,000 (if operations originate and are provided solely within the park), or provide services that both originate and terminate outside the park.

A cornerstone of National Park Service management is a preference for out- of- park private enterprise. It is National Park Service policy that if adequate commercial facilities are available to serve visitors outside of the park boundary, no new facilities will be developed, nor will existing facilities be expanded within parks (NPS Management Policies 2001). This helps protect the integrity of park resources, the quality of the visitor experience, and the viability of businesses in the neighboring communities.

A Moratorium on IBPs

IBP levels have not increased since 1998, due to a moratorium imposed by the Superintendent of Mount Rainier National Park. The primary reason for the moratorium was a management issue with IBPs. Prior to the 1998 Act, if a park deemed

one kind of activity “appropriate” and issued a permit for it, it was difficult to limit the number of other permits issued for the same kind of activity. The park’s relative difficulty in limiting the number of IBPs created the potential for serious impacts on resources and visitor enjoyment. This led to the moratorium.

IBPs Will Become CUAs

Changes resulting from the 1998 National Park Service Concessions Management Improvement Act (PL 105-391 – referred to as the 1998 Act) will affect commercial authorization instruments. Incidental business permits (IBPs) will be replaced by commercial use authorizations (CUAs). The rules for implementing CUAs are being developed on a national level and, once completed, will apply to all national parks. The implementation date for the new rules is currently unknown.

Those commercial services currently being conducted under IBPs, which the park determines will have minimal impact on the resources and values of the park will be conducted under CUAs. The park’s moratorium on issuing IBPs / CUAs will be lifted as the Commercial Services Plan is implemented, and limits described in this plan will take effect.

It is important to see the non-profit and special use permit sections of this plan for additional information on permitting requirements for non-profit, educational and governmental groups.

When Will the Moratorium on IBPs Be Lifted?

With the 1998 Act, the park is now required to authorize only such services that it determines will have minimal impacts on the resources and values of the park. Services must be consistent with the purpose for which the park was established, with applicable management plans, park policies and regulations. The park has no authority to issue more authorizations than are consistent with the preservation and proper management of park resources and values.

The moratorium will be lifted as the Commercial Services Plan is implemented. Certain activities outlined in this plan may be implemented as soon as 2006.

What Will Happen When IBPs become CUAs?

Regulations relating to CUAs are being developed by the National Park Service, and it is difficult to predict exactly how CUAs would be administered. But according to the 1998 Act, CUAs will have a lot in common with IBPs. Just as with IBP holders, CUA holders will:

- Have minimal impact on resources and values;
- Conduct activities consistent with the purposes of the park;
- Conduct activities subject to certain conditions and stipulations, such as number of participants, location, dates and times;

- Have no preferential right of renewal;
- Be monitored by park staff to ensure that the activities they conduct are safe, fair, and appropriate;
- Pay a reasonable fee which, at a minimum, allows the park to recover management and administration costs;
- Not generally be assigned land or facilities inside the park; and
- Not claim an exclusive right to provide services.

Special Use Permits

In Mount Rainier National Park, special use permits are granted for activities such as non- denominational religious services in campgrounds, weddings, commercial filming, scientific research and monitoring, and commercial photography. Mount Rainier also has a special use permit for visitors climbing above 10,000 feet or on glaciers. The cost of the climbing permit funds the Mountaineering Cost Recovery Program, providing climber safety education, administration, and human waste removal.

Mount Rainier National Park has traditionally included activities conducted by non-profit entities as commercial activities if members of the group were being compensated for their participation in the activity. While the final rules for CUAs have not been issued by the National Park Service yet, the 1998 Act indicates that non- profit organizations will be exempted from applying for CUAs if their activity does not generate taxable income. As a result of this change, the park anticipates using the special use permit process, rather than the CUA process, for evaluating and authorizing non- profit activities, where appropriate.

Just as with climbing permits, Mount Rainier National Park recovers costs incurred in administering and monitoring special use permits. The park establishes and collects additional fees as authorized by legislation, regulations, and policies. Applicants must indemnify the United States Government and protect the public by providing certificates of insurance when required. Under certain circumstances, performance bonds may be required for permitted activities.

National Park Service Management Policies (2001) define a special park use as a short term activity that takes place in a park area, and:

- Provides a benefit to an individual, group, or organization rather than the public at large;
- Requires written authorization and some degree of management control from the National Park Service to protect park resources and the public interest;
- Is not prohibited by law or regulation;
- Is not initiated, sponsored, or conducted by the National Park Service; and
- Is not managed under a concessions contract, a recreation activity for which the NPS charges a fee, or a lease.

The 2001 Management Policies also state that unless mandated by statute, the National Park Service will *not* allow visitors to conduct activities that:

- Would impair park resources or values;
- Create an unsafe or unhealthy environment for other visitors or employees;
- Are contrary to the purposes for which the park was established;
- Unreasonably interfere with the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park;
- Would disrupt NPS interpretive, visitor service, administrative, or other activities
- Impede NPS concessioner or contractor operations or services; or
- Interfere with other existing, appropriate park uses.

Cooperating Associations

Congress authorized cooperating associations in 1946. Their mission is to support park interpretive and scientific activities through proceeds from sales of educational and interpretive materials in a park. They are usually assigned space in a visitor center or other visitor contact facility. Cooperating associations are authorized by cooperative agreements. They are managed by a service- wide set of criteria and policies found in NPS Director's Order 32: Cooperating Associations.

Northwest Interpretive Association (NWIA) – This organization supports Mount Rainier National Park's interpretive programs through the sale of educational and interpretive materials in the park. The association is assigned sales areas in visitor centers and museums in Longmire, Ohanapecosh, Paradise, Sunrise, and Wilkeson. An agreement between the park and the association authorizes and directs how association business will be conducted. The activities of this association are outside of the scope of this plan.

Mount Rainier Institute – There is a proposal to create a Mount Rainier Institute at the park. This would likely be a non- profit organization that would conduct educational programs. The institute would likely be authorized through a cooperative agreement and be classified as a cooperating association. The park anticipates that some day use and overnight use, currently intended to be provided through the CUA process, may be shifted to this institute. This could result in either a reduced number of CUAs for certain activities or a decreased level of activity for some CUAs. The level and types of activities that the proposed institute would provide are currently unknown.

Historic Leasing Program

In 1982 the National Park Service established the Historic Leasing Program to lease historic structures and agricultural land to individuals and organizations. The program

was designed to spur rehabilitation and reuse of designated historic structures and federally owned lands. Any proceeds from these leases are to be used to maintain, repair, and preserve historic properties and to defray the costs of administering the program.

Under the 1998 Act, general leasing authority was granted for the use of buildings and associated property administered by the National Park Service. Such leasing authority is not to be used to authorize activities that are subject to authorization under a concessions contract, commercial use authorization, or similar instrument. Regulations were published in the Federal Register on December 27, 2001 (36 CFR Part 51). At this time, there are no historic leases in Mount Rainier National Park.

Home Businesses

The National Park Service recognizes that parks are not only places of work, but can also be homes to both federal and concession employees. The National Park Service recognizes the right of resident employees to conduct their personal lives with the same degree of freedom they would have if they lived in private housing outside the parks, provided that such conduct doesn't impair park resources, values or administration.

Home business of the following nature may be approved:

- Where the product produced is sold outside the park;
- Where the goods or services are provided to employees and others living in the park, and there is no door- to- door solicitation; or
- Where the business is conducted by telephone or mail.

Tenants must seek the approval of the superintendent or site manager prior to conducting a business. NPS Director's Orders 36 (Housing Management) and 37 (Home Businesses in the Park) deal with these issues and, at the time of this document, are in draft form waiting to be finalized.

Non-Profit Organizations

A number of non- profit organizations provide services at Mount Rainier National Park. Non- profit organizations include groups and clubs where leaders and guides are usually volunteers and participants are members rather than clients, and more formal groups where leaders and guides are compensated for their participation. Other organizations include government entities (e.g. community recreation programs) and educational institutions where recognized academic credit is awarded for participating in the activity. A few non- profits work directly with parks through cooperative agreements and other authorizations. Some non- profits earn taxable income from their activities while other non- profits derive no taxable income from their activities.

Non- profit activities can be managed through cooperative agreements, but are more commonly managed through the special use permit process. The 1998 Act exempted non- profits from the CUA process as long as their activity didn't generate taxable

income. The traditional IBP process generally viewed activities as commercial or non-commercial rather than for profit versus non-profit. Commercial entities generally compensated leaders and guides while non-commercial entities utilized volunteers.

With the new rules and recognition that more organizations will likely be exempted from the commercial permitting process (IBPs/CUAs), alternative methods will need to be implemented for managing non-profit activity. The park recognizes that the same rules that apply to commercial operators should generally apply to non-profit clubs and organizations. The park will develop mechanisms for managing non-profit activities at the park.

Appendix 4:

Commercial Services Plan Public Process

In spring 2002, the Commercial Services Planning Team facilitated public meetings in Ashford, Tacoma, Yakima, and Seattle, as well as a park staff meeting in Longmire, to gather input about the future of park commercial services. Park staff members were also asked for their comments. The meetings provided a springboard for discussion among planning team members and ultimately helped shape the alternatives.

Following the public scoping period, the park developed a draft commercial services plan. The draft plan and the accompanying environmental assessment (EA), were released for public comment on August 27, 2003 for a 90 day comment period. Public meetings were again held in Ashford, Seattle, Tacoma, and Yakima. News stories about the plan were published in numerous local, regional and national publications including *The Dispatch* (Eatonville), *The News Tribune* (Tacoma), *Outside Magazine Online* and the *Wall Street Journal*.

Several hundred comments were recorded at the public meetings. Approximately 1,900 letters and emails were received from across the nation and from several foreign countries. The vast majority of the comments received related to attributes of the climbing alternatives. A more in- depth discussion of the public process is found in the Errata to the Environmental Assessment and FONSI (Finding of No Significant Impact) for this plan.

Summary of Public Comments

The greatest number and variety of public comments received on the CSP related to the provision of concessioner guided climbing on Mount Rainier. Overwhelming support was expressed for an increased number of service providers, although how many concessions there should be or how the increase or decrease in guided climbing should be distributed among climbing routes varied widely. Comments identified both beneficial and adverse consequences of multiple guide services on Mount Rainier. A large number of respondents did not comment on the text of the plan or EA, but rather responded to informational messages they received from various commercial businesses, some associated and some not associated with the park.

Strong support was received for the proposed new commercial guiding category – Single Trip Guides, however there was a great deal of confusion about the certification requirements that would be required of these guides. (Clarifications have been provided in the revised plan.)

While divided, the majority of respondents also favored the addition of commercial free areas. There were numerous variations on the commercial free idea which were

suggested, many which were already in the plan in one form or another. Although many park areas were specifically mentioned, there was no clear consensus about most of the areas included in the proposed commercial free zone with the exception of Liberty Ridge. Most respondents, who commented on Liberty Ridge being included as a commercial free area, favored its return to commercial use. Based on public comments and staff analysis, a new low elevation commercial free area was also added to the selected alternative to address concerns voiced by independent wilderness visitors and because of further analysis of the proposal to formally designate commercial free/commercial use areas in the park.

Many comments were concerned with a perceived overall reduction in the amount of guided climbing or in the number of guides. While the plan did call for a reduction in the maximum potential use, it proposed limits that, in reality, exceeded the highest actual levels ever achieved on the Mountain. Peak season daily limits were, however, not as high as had previously been possible. (In the selected alternative, actual limits remain above the peak season average, while the potential for dramatically increased commercial climbing and other activities has similarly been decreased.)

Over 30 variations for the guided climbing alternatives were proposed. While these did propose changing the number of, or limits for, concessioners on various routes, or the ability to implement other alternative variations (such as client to guide ratios, commercial free times or seasonal limits), they were well within the range of alternatives evaluated in the EA and would not result in substantial differences to the degree of environmental impacts described in the EA. (Notable differences are detailed in the Errata.)

While most respondents identified an alternative preference (the majority favored Alternative 3), most did not clarify the reasons for their preference. Quite a few respondents also expressed dissatisfaction that only Alternative 3 offered more than one guide service on the most popular route (Muir).

Although public comments overwhelmingly favored competition, analysis of these comments was unable to ferret out (for many of the comments) what most appealed to respondents about competition – competition in the selection process, competing guide services on the same routes, competing guide services on different routes, equal allocations of guiding business, the potential for better services or more reasonable costs, or another aspect of competition. Most likely, for many respondents, it was a combination of the factors listed above, as well as others discussed in more detail in the Response to Comments (see Errata). For other respondents who mentioned all of these and more, it was clear that many aspects of competition, including the principle of a healthy marketplace itself, appealed to them.

Camp Muir topped the list of comments about operational concerns. Many respondents were stymied about how the camp and its systems would be managed with respect to the

multiple guide services proposed for the Muir Corridor, given the other tenets of the plan. Numerous creative ideas were put forth about just how the camp could be managed or conversely why camp management would not work with multiple guide services. These comments resulted in a closer examination of operational issues at Camp Muir by the planning team and some minor revisions and clarifications to the proposed alternatives as noted in the Errata. In contrast, there were very few comments about the operational issues of multiple guide services on routes other than Muir.

In addition to comments about Camp Muir itself, there were a fair number of concerns about whether and how the Muir Route would be maintained to preserve its status as a novice route for both independent and guided climbers. Again, there were some unique suggestions and solutions to address the issue of how the established route aids could be used by multiple guide services as well as comments that indicated sharing could not be achieved.

Respondents were divided about the relative safety of guided vs. non-guided groups. Many cited now infamous climbing accidents related to either guided or non-guided climbers in support of their stated viewpoint. Some expressed disbelief that the relative safety of climbers would even be considered an issue in the provision of guided climbing limits, given that accidents befall both the prepared and the unprepared without preference for either user group.

A unique set of comments on the plan compared the guided climbing experience on Mount Rainier to other mountains of the nation and the world. There were many fascinating stories of antagonism and cooperation and unique visitor experiences related in an effort by respondents to confirm or deny the ability of multiple guide services to work together.

Numerous respondents questioned the ability of the park to identify commercial visitor use limits in the absence of independent visitor use limits or in the absence of modifications to the Wilderness Management Plan. There were also many comments about the sanctity of limits identified in the Wilderness Management Plan and questions about how they could be/have been modified over time in response to changing conditions.

A similar number of respondents also were concerned about the effects of commercial use limits prior to definitive carrying capacity studies or about the longevity of the proposed limits. Some were confused about the use of the 2001 “baseline” data in the plan and its projection as the basis for the No Action Alternative. (As noted in the previously released plan and EA, the limits are, in fact, interim limits and may be revised pending future revisions to the Wilderness Management Plan or carrying capacity analyses. The rationale for the limits is explained both in the previously released documents and in the Response to Comments – see Errata.)

There were a large number of comments relating personal experiences of independent and guided climbers concerning the relative merits of various commercial guide services, including the ability of these guide services to provide visitor experiences different from, superior or inferior to those provided by the current concessioner.

While most of those who commented on the plan and EA could be identified as commercial guide service clients, there were also many comments from independent climbers. These respondents expressed concern with the large commercial groups encountered in the past at the park; difficulty in the ability to get permits given the ability of commercial guides to reserve sites in advance of the public reservation system; the ability to experience wilderness solitude (given the higher guided climbing limits on some relatively low use routes); and the need to more closely manage some routes to avoid conflicts (including territoriality) between independent and commercial user groups; etc.

There were also a number of general comments about the means to determine the qualifications of various commercial guides and guide services; the need to motivate commercial operators to provide exceptional service; the need to enforce and more formally educate visitors about current resource protection measures; and the need for ensuring that guide services and the visitor experiences they provide are monitored for compliance with Leave No Trace, messages that affirm and stimulate clients to support the preservation and public use mission of the NPS and the park, as well as on first aid and safety requirements.

Many businesses commented on the minimal limits associated with the appropriate but not necessary designation for guided wilderness use (given the much greater capacity of park wilderness and the dramatically higher limits and percentage of total use proposed for guided climbing concessioners). Many independent visitors countered this perspective by commenting on the already overcrowded nature of the park's wilderness camps during the peak season, a fact supported by analysis of wilderness use in the EA. There were also a few comments that supported year- round cross- country use and more flexibility being allowed in the number and location of allowable trips.

As a result of several comments regarding the number of permits (particularly CUAs) that would be required to conduct various guided activities and on the seemingly artificial separation of guided activities into climbing, wilderness, alpine wilderness and additional services, many of these have been recombined to form the selected alternative. In addition some overly restrictive categories (mountain circumnavigations and Muir Winter Guides, for instance) have been modified to increase flexibility in their use by both businesses and visitors.

Some businesses and individuals were concerned with the financial feasibility of both the climbing alternatives and the other guided visitor services CUAs. While a financial feasibility analysis was conducted (as noted in the EA) for the guided climbing

alternatives, one was not conducted for the CUA services because these are not intended (by the use of this authorization instrument) to be stand-alone businesses, rather they are often part of a more diversified service provider's portfolio.

Some businesses and individuals were also concerned with how the CSP would be implemented in terms of permit allocation and phasing issues. Some of those concerns have been addressed in the revised plan, however many will need to wait for the implementing regulations for Section 418 of PL 105-391 to become final and/or for the response to the prospectus or various CUA calls.

Similar to the GMP planning process, there were numerous comments about shuttle transportation. While very few respondents overall commented on the various instruments that would be used by the park to manage commercial use, there were many comments questioning why shuttles had not been made a concession. Although most respondents favored shuttle transportation planning, most also did not think a viable business model had been proposed in the plan (given the maximum two year timeframe for with CUAs) and therefore thought that the plan did not go far enough in finding a means of implementing shuttle transportation in the park. While the baby steps approach was, in fact, acknowledged in the draft plan, some additional clarification has been added to the selected alternative to address this issue.

With respect to resource preservation and impacts, comments from both independent and guided park visitors identified compliance with resource protection measures, such as LNT as more problematic with the other group.

Finally, there were a wide array of comments on the planning process, including questions regarding the sequencing of park planning efforts; questions about the appropriateness of actions proposed in the CSP given previous park plans; and comments about potentially missing information and the timing of the process.

Conclusion

The public comment response to the plan and EA was, as noted above, considerable. Unlike the public scoping comments, which were fewer in number and more vague, the comments on the plan and EA provided a sound means to gauge the sensitivities and viewpoints of both independent and commercial visitors, as well as the businesses who would like to either begin to or continue to conduct operations in the park. There were few specific comments on the adequacy of environmental analysis, especially with respect to questions regarding the significance of the proposed actions and their effects on park resources. Neither public comments nor agency reviews identified any significant environmental impacts that would occur with the adoption of the Commercial Services Plan.

Although the comments were highly focused on guided climbing issues, they ranged broadly over the issues addressed in the plan. As might be expected, there were also

many singularly poignant comments about many issues that, upon further discussion and analysis by the planning team, often proved to be instrumental in effecting changes in the revised plan to address the majority of viewpoints expressed by other individuals.

Appendix 5: Planning Issues - Issues Driving the Need for a Plan



In addition to issues brought up during the public scoping and review process, the Commercial Services Planning Team took into account other planning issues, many of which were described in the 2002 General Management Plan. Some of the planning issues are action items while others are concerns that needed to be addressed. The following are the most relevant to commercial services:

Changes to Commercial Services

- The contract for lodging, food service, gift sales, and ski and snowshoe rental, and guided ski trips held by Guest Services, Incorporated (GSI) expires December 31st, 2012, and would not be reviewed in this Commercial Services Plan.
- Regulations are being developed and reviewed on the national level for the implementation of commercial use authorizations (CUAs), which will replace incidental business permits (IBPs). Although the substance of these regulations cannot be fully anticipated, this plan will comply with them when they are finalized.
- A moratorium on new IBPs and increased levels of service has been in place since 1998. With the adoption of this final plan, the moratorium will be removed and the commercial opportunities noted in the plan can be implemented on a phased-in basis.

Commercial Service Provider Training

- Only a small percentage of commercial service employees receive an orientation to the National Park Service mission and an explanation of the important role that they play in protecting park resources and enhancing the experience of visitors.
- The GMP calls for increasing both the amount and effectiveness of information provided to visitors, partners, and employees.
- The park's Interpretive Plan calls for greater sharing of park values with commercial service employees.

Parking and Traffic

- On peak summer days vehicle congestion at park entrances, parking areas, and wilderness trailheads continues to adversely affect the quality of visitor experience. There is a high demand for access to the park.
- The General Management Plan calls for the expansion of business opportunities for visitor shuttles to help resolve parking problems and congestion, provide visitors with an alternative method of accessing popular areas, decrease air and noise pollution, improve park access, save energy, and simplify travel.
- An extensive transportation study called for in the General Management Plan will eventually provide guidance as to how to achieve General Management Plan goals for a more comprehensive shuttle system.

Climbing

- Mount Rainier's terrain and weather conditions offer world- class climbing opportunities that have tested the skills of climbers for more than a century.
- Approximately 10,000 people attempt to climb Mount Rainier's summit each year. Approximately 1/3 of these climb with professional guides.
- There is a need to issue a prospectus for guided climbing.

Wilderness Use

- In some areas, large numbers of people visiting the wilderness are degrading and damaging park resources.
- Public views differ on what visitor experiences are appropriate in Mount Rainier Wilderness.
- The Wilderness Management Plan, which identifies the standards for the limits of acceptable change in wilderness areas, sets use limits, and takes other actions based on these standards, is scheduled for revision.
- The GMP calls for visitor carrying capacity studies to measure the type and level of visitor use that can be accommodated while sustaining desired resource and visitor experience conditions.

Guided Wilderness Use (summer)

- Public demand for backcountry sites is high during the summer season, particularly on the Wonderland Trail in July and August.
- Park backcountry campsites (subalpine and the Wonderland Trail) are generally filled to capacity during peak periods.
- Approximately 60% of campsites are available through the fee reservation system;

others are first- come, first- served.

- There are limited opportunities for certain kinds of non- summit guided experiences.

Guided Wilderness Use (winter)

- Public demand for backcountry activities during the winter season is low.
- Similar activities should be authorized under one permit rather than through several permits.

Commercially Guided Day Use Activities

- Visitors are concentrated in a few areas of the park, such as Paradise and Sunrise.
- Off- trail use in these areas results in the trampling of sensitive vegetation.
- The GMP calls for dispersing visitors away from heavily used front- country areas
- Mount Rainier National Park is an appropriate place to learn about natural and cultural resources.
- Very few commercial day use activities have traditionally been offered at Mount Rainier, and most of those that are offered are snow and ice related courses connected with summit attempts.
- Visitors arriving on common carriers (commercial buses and vans) should be encouraged to explore the park, and their drivers and/or guides should be encouraged to accompany them over reasonable distances to provide them with accurate information and to encourage them to protect park resources.
- Because of the moratorium, no new day use IBPs/CUAs have been issued and commercial travel tour providers have been unable to guide their clients outside of the vehicle.

Bicycling

- Occasional heavy traffic, steep and narrow roads without adequate shoulders, and contrasting light and shadow in forested areas on sunny days make bicycling a potentially dangerous activity.
- There are few areas for cars to safely pass bicyclists, which can increase traffic congestion.

Towing Services

- Towing services are necessary and appropriate in Mount Rainier National Park, not only for visitor convenience, but for road safety.
- Independent travelers frequently contact road service companies by cell phone or through travel organizations rather than contacting towing companies who have permits with the park.

- Expediently assisting stranded motorists benefits the visitor as well as the park.

Commercial Free Zones

National parks, by regulation (36 CFR 5.3), are commercial free zones. Commercial activities, with few exceptions, must be specifically authorized by park management through a permit, contract or some other authorization (NPS Management Policies 2001). The 1998 Act specifically limits concessions activities to those that are “...consistent to the highest practicable degree with the preservation and conservation of the resources and values of the unit.” The Act goes on to note, in a section concerning CUAs, that the National Park Service shall “...have no authority...to issue more authorizations than are consistent with the preservation and proper management of park resources and values...”

The antithesis to the common perception concerning a perceived right to conduct commercial activities in a national park is that park managers must develop compelling arguments for allowing a commercial activity to occur. There is an obligation to preserve management options for the future (by not fully exploiting every conceivable use opportunity) and to ensure that decisions made today do not restrict the park’s ability to adapt to changing conditions.

The following are some additional planning considerations related to this topic:

- Use cannot occur in the Butter Creek Research Natural Area, and has historically been either prohibited or discouraged from the South Tahoma Glacier due to a Marine plane crash in 1946.
- Commercial operators tend to have an inherent advantage over independent users in obtaining reservations because they are familiar with the reservations process and because they tend to be local and therefore also able to obtain walk- up (first-come, first- served) permits.

Commercial Travel Tours

- Most commercial van and bus tours enter the park by paying commercial entrance fees collected at entrance stations.
- Tour leaders/drivers are only permitted to accompany their clients while they are in the vehicle or within a 1 mile radius of the vehicle (short trails near developed areas, visitor centers, concessions facilities, overlooks and similar areas).
- Activities will not conflict with NPS programs.
- IBPs/CUAs are required for groups intending to hike distances greater than 1 mile from their common carrier vehicle.
- Approximately 200 different tour companies visit the park, some arriving daily, some weekly, and others at less regular intervals.
- Since commercial bus tour access rules for entry into National Parks are generally established nationally, they will be minimally addressed in this plan.

Firewood Sales

The following concerns have been expressed about campfires in the park:

- The General Management Plan calls for permanent changes to campground facilities, including potentially creating centralized fire pits in each campground, and re- evaluating existing campsite fire pits to reduce air pollutant emission sources.
- Firewood sales may continue until the GMP is fully implemented.
- Firewood sales are managed through concessions contracts. The following contracts are currently in effect:
 - Cougar Rock – Firewood sales are managed by Guest Services, Inc. (GSI). GSI's contract will expire in 2012.
 - Ohanapecosh and White River Campgrounds – Firewood sales are managed by John P. Squires, sole proprietor. Like the climbing contract, this contract has been extended and likely will continue to be extended until the Commercial Services Plan is approved and implemented.
 - Ipsut Creek, Mowich Lake and Sunshine Point Campgrounds do not have firewood sales. While fires are permitted at Ipsut Creek and Sunshine Point (and firewood may be obtained locally), no fires are permitted at Mowich Lake.

Appendix 6:

Impact Avoidance, Minimization and Mitigation Measures

The following measures would be implemented as part of the Commercial Services Plan. These measures have been developed to address potential adverse effects associated with the plan. The measures herein come from the Finding of No Significant Impact for the Commercially Guided Visitor Use and Other Services Environmental Assessment.

Common to All (Guided Climbing, Guided Summer and Winter Wilderness, Additional Services) General Conditions

Commercial groups must follow park rules and regulations, including not accessing areas off limits to independent visitors. (All resource categories)

Define interim maximum allowable use limits for commercial services that will be in effect until revisions to this plan, the Wilderness Management Plan or carrying capacity studies have been completed. Set interim limits for the maximum number of commercial clients and guides and user nights, as well as the number of trips for the activities described in the plan. (All resource categories)

Maximum group sizes (12 and 5) have been designated for activities described in the plan. (All resource categories)

Approved activities, if found to be incompatible with resource protection, visitor enjoyment and/or visitor safety may be suspended or terminated. (All resource categories)

High and low elevation commercial free areas have been designated. (All resource categories)

To expedite entry into the park, commercial operators would collect all cost- recovery and entrance fees from their clients for the park. (Park Operations)

Concessioners may compete for CUAs not related to services authorized through their concessions contracts. (Park Operations)

CUA holders found in violation of their CUA may have their permits suspended or revoked and would generally be ineligible for subsequent authorizations. (All resource categories)

Concessioners found in violation of their contracts would be managed through the provisions of 36 CFR Part 51 and current NPS policies. (All resource categories)

A new commercial services evaluation process would be implemented that includes

evaluation of impacts to all park resources. (All resource categories)

Resource Protection

Commercial service providers would give their park employees and guides an introduction to NPS and park mission and values and would share this information with their clients.

Commercial groups would follow Leave No Trace principles and practices.

Commercial groups would use established toilets where available and the blue bag system for winter and high elevation human waste disposal.

Groups traveling or camping in alpine areas to access climbing routes would use previously impacted or designated sites if present.

Except in winter, or when entirely on snow, commercial groups would use designated trails or standard routes, designated camps and campsites to conduct their activities. During melt- out commercial groups would follow marked trails.

Transportation

To reduce traffic congestion and to maximize available parking, all commercial services are required to provide in- park shuttle transportation for their employees and clients with the exception of day guides, who may also travel in client vehicles.

To ensure adequate access for independent visitors, no more than 2 commercial vehicles can be parked at a trailhead at one time (this does not include the upper Paradise parking lot, the Longmire parking lot or the Sunrise parking lot).

Visitor Experience

For backcountry climbing and camping, summer regulations start May 15 *or* when the snow depth is less than 2 feet—*whichever is earlier*. Summer regulations end on September 30 *or* when snow depth is more than 2 feet—*whichever is later*.

Winter regulations start on October 1 *or* when snow depth is more than 2 feet—*whichever is later*. Winter regulations end on May 14 *or* when snow depth is less than 2 feet—*whichever is earlier*.

In the Paradise area, the same dates apply; however, the determining snow depth is 5 feet instead of 2 feet. It therefore is possible to have winter regulations and summer regulations applied at the same time in different locations in the park.

Drive in campground reservations would be made through the park or public reservation system in competition with the public.

Because the ability to use designated backcountry individual or group campsites must be allocated for commercial parties (except for concessioners guiding on *Other* climbing routes), spaces would be reserved in advance of the opening of the public reservation system. Spaces requested after the opening of the reservation system each year would be reserved in competition with the public (commercial service providers and the public would be reserving spaces at the same time).

Except for Single Trip Guide parties, there would be no more than one commercial group per cross- country zone, alpine zone or designated camp, except at Camps Muir, Schurman and on the Kautz Route.

The Paradise non- wilderness area would be limited to two overnight commercial groups per night in winter.

Groups of 12 or fewer may travel and camp in cross- country zones (on snow) in winter. Only climbing groups of 5 or fewer may use alpine zones in summer (except on Muir, Emmons and Kautz Routes) and excluding commercial free areas.

(Climbing) Overnight spaces for concessioners would be allotted at the beginning of each season (except for Other Routes) and verified daily. Except for use of the Muir Snowfield group site, the unused portion would be made available to the public. (Visitor Experience)

(Climbing) Staggered starts would be used on the Muir, Emmons and Kautz Routes to minimize congestion at route chokepoints. (Park Operations, Visitor Experience)

(Climbing) Rotating use would be used on the Kautz and Emmons routes to minimize overlap at camps and to stay within the overnight limits for commercial groups identified in the plan. (Park Operations, Visitor Experience)

(Climbing) There would be no Friday or Saturday night stays for commercial groups in Alpine Training courses, on the Emmons, Kautz or Liberty Ridge routes, or for Single Trip Guides. (Visitor Experience, Park Operations)

(Climbing) Mountaineering Day Schools would occur on snow in the Paradise Day Use Area. (Water Quality, Soils and Vegetation)

(Climbing) Commercial groups would access climbing routes only via standard approach routes. (Water Quality, Soils and Vegetation)

(Climbing) Commercial groups would access the Kautz Route and Fuhrer's Finger via Paradise rather than Van Trump Park. (Water Quality, Soils and Vegetation)

(Climbing) A commercial group camping area would be designated on the Muir Snowfield, which would not be available through the public reservation system. (Soils and Vegetation, Visitor Experience)

(Climbing) Mountaineering training would occur enroute, in the Muir Mountaineering Day Schools or outside the park for climbs on Emmons, Kautz and Other Routes, as well as for Single Trip Guides. (Soils and Vegetation)

(Guided Wilderness) There would be no cross- country/alpine use in summer. (Water Quality, Soils and Vegetation)

(Guided Wilderness) No more than one night may be spent in any one designated camp. (Visitor Experience)

(Guided Wilderness) Groups of 5 or fewer would camp in individual sites; groups of 6- 12 would camp in group sites. (Visitor Experience)

(Guided Wilderness) There would be no commercial overnight camping along the Wonderland Trail in July and August. (Visitor Experience)

(Alpine Training) Only the Alpine Winthrop, Alpine Paradise (Paradise Glacier) and Alpine Nisqually (Nisqually Glacier) zones. (Water Quality, Soils and Vegetation, Visitor Experience)

(Alpine Training) Groups would not be permitted to camp below 10,500 feet in the Alpine Nisqually or Alpine Winthrop areas. (Visitor Experience)

(Alpine Training) Alpine Training may occur for a maximum of four consecutive nights. (Visitor Experience)

(Additional Services) All hiking would be on designated trails. Incidental hiking would be no more than one mile from trailhead. (Soils and Vegetation, Visitor Experience)

(Additional Services) No guided day use winter trips may be conducted within a ¼ mile radius of developed areas at Paradise, Longmire or Sunrise. (Park Operations)

(Additional Services) Guided day use would not be conducted at park Visitor Centers, the Paradise or National Park inns, campgrounds, Paradise Meadows or on the following trails: Nisqually Vista Trail, Ohanapecosh Hot Springs Trail, Grove of the Patriarchs, Trail of the Shadows, Sunrise Loop Trail, or Fremont Lookout). (Park Operations)

(Additional Services) Firewood sales would only continue until campground fire use is reevaluated and/or redesigned as called for by the GMP. (Air Quality, Visitor Experience)

Air Quality

Common to All General Conditions above plus:

There would be no idling of buses or shuttles (GMP requirement would be enforced).

(Guided Wilderness) No cross- country travel and camping in summer. All hiking would be on designated trails.

(Additional Services) There would be continued effort by the park to facilitate the development of a Visitor Transportation Plan.

(Additional Services) Low speed limits would continue to apply to the park's gravel roads to minimize dust generation.

Water Quality

The following general strategies are employed by the park to limit water quality impacts from ongoing park operations:

- requiring permits for overnight use (these encourage minimum impact techniques, and ensure allowed use is consistent with established overnight wilderness limits);
- constructing trails in appropriate terrain, using established techniques;
- rehabilitating social trails;
- requiring designated trailside camps a minimum of 200 feet from water sources;
- locating toilets (pit, composting or solar) at trailside camps.
- establishing the blue bag system for winter and high elevation human waste disposal;
- minimizing group sizes in wilderness (overnight party sizes of 12 or fewer and 5 or fewer);
- limiting the use of sensitive areas by large groups

In addition, park commercial groups would be required to:

- use impact minimization techniques, such as *Leave No Trace*;
- use biodegradable soap and dispose of gray water more than 200 feet from water sources;
- use maintained or established way trails to limit establishment of social trails and consequent soil erosion;
- use rest stops on snow, or durable or established areas;
- camp and recreate on snow, rather than in fragile subalpine or alpine plant communities;
- use blue bags during high elevation travel; and to
- walk on snow, rather than sensitive emerging vegetation, whenever possible.

(Climbing) There would be improved human waste management practices over time, most notably at Camp Muir, where a site specific Development Concept Plan is pending and which will, among other issues, address human waste.

(Climbing) Groups traveling or camping in cross- country or alpine areas to access climbing routes would use previously impacted or designated sites if present.

(Climbing) Construction of a self- contained toilet at Camp Schurman would not release waste into the surrounding environment.

(Guided Wilderness and Additional Services) No cross- country travel and camping in summer. All hiking would be on designated trails.

(Guided Wilderness) Large and small commercial groups would be required to use designated trailside camps.

Geological Hazards – Guided Climbing, Guided Summer and Winter Wilderness, Additional Services

Commercial service providers would give their park employees, within their NPS and park mission and values training, an orientation to geological hazards that could potentially occur within the park and what to do in the event of these emergencies. Service providers would also share this information with their clients, especially those who might be exposed to Case III geological hazards areas such as in the Westside Road and White River areas.

Vegetation and Soils (Guided Climbing, Summer and Winter Guided Wilderness and Additional Services)

Common to All General Conditions above plus:

In addition to the personal, physical, written and regulatory strategies used by the park to modify the potential to impact soils and vegetation, the following additional strategies would be required:

- Commercial guides would be required to participate in formal orientation training to better understand the National Park Service and park's mission and goals and to share this information with their clients;
- There would be increased monitoring of commercial services by climbing, resource and concessions staff through the revenue generated from commercial services (a portion of which may be used for administration and monitoring); and
- There would be increased designation of campsites along climbing routes.

(Climbing) The future potential for major impacts would be prevented by the seasonality of some climbing routes (thereby reducing the maximum potential use), development of revised Wilderness Management Plan and/or carrying capacity analyses implementation and the small contribution of commercial use compared to independent use, as well as the incorporation of strategies that would avoid, minimize or mitigate impacts.

(Climbing) Mountaineering Day Schools would occur on snow in the Paradise Day Use Area.

(Climbing) Allow commercial camping on the Muir Snowfield, but designate a commercial group only camping area.

(Climbing) Designate or define standard climbing route access paths through typically snow-free areas above currently designated trails (past “end of maintained trail” signs);

(Climbing) Commercial groups would access the Kautz Route and Fuhrer’s Finger via Paradise rather than Van Trump Park.

(Climbing) Commercial groups would access the Emmons Route or Winthrop Glacier Route only via the Inter Glacier, no access is allowed via Mount Ruth.

(Summer Guided Wilderness) Common to Vegetation and Soils above plus No cross-country travel is permitted (walks/hikes must occur on designated trails).

Wildlife (Guided Climbing, Guided Summer and Winter Wilderness, and Additional Services)

Common to All General Conditions Above Plus additional strategies noted above under Soils and Vegetation plus:

Administrative helicopter use would continue to avoid sensitive wildlife habitat and incorporate analysis of potential wildlife impacts, and travel over the shortest (or most appropriate, given wildlife analysis) path.

Existing park regulations and policies would continue to prevent the feeding and harassment of wildlife.

Ongoing park education and enforcement to limit food scraps and litter would continue.

There would be additional designation of trail segments beyond the “end of maintained trail” signs.

Campsite designation would also reduce impacts where campsites have developed in sensitive areas and where suitable durable sites exist nearby.

Typically poor winter weather conditions would likely diminish the effects of increasing the potential for some day use commercial activities in winter.

The park would continue to close sensitive areas to visitor use during breeding seasons as appropriate and would also continue to conduct ongoing environmental impact

analysis/demographic studies on key species to determine the effects of park activities on them.

Special Status Species (Guided Climbing, Guided Summer and Winter Wilderness, and Additional Services)

When nesting areas are found (during ongoing surveys) near designated wilderness camps or trails or other developed areas, areas are monitored more closely and closures enacted as appropriate to prevent disturbance.

Administrative helicopter flights for human waste barrel placement and removal and re-supply of high camps originate from a helispot located above the elevation of both nesting northern spotted owls and marbled murrelets or from a helibase not located in suitable habitat. During the early nesting season, flights that originate at the lower helibase are required to fly 5,200 feet above the canopy, whereas during the late nesting season they may fly 2,600 feet above the canopy over suitable habitat.

No suitable habitat would be removed or modified as a result of the proposed action.

Where marbled murrelet occupied behavior has been documented, park administrative activities are also limited to the period from 2 hours after sunrise to 2 hours before sunset.

As noted above helicopter flights and other administrative activities would continue to be restricted in known nesting areas (which would continue to be assessed through ongoing demographic surveys) throughout the nesting season.

The proposed action would not result in any additional roads being plowed or opened to winter use and would not result in any habitat modification or removal beyond that which has already occurred in developed areas.

Prehistoric and Historic Archeology

Common to All General Conditions above plus:

Before project implementation, areas proposed for trail extensions or campsite designation would be delineated, surveyed and monitored (as appropriate) to ensure no adverse effect on archeological resources.

If prehistoric or historic archeological resources are discovered during any portion of a proposed action, work in the area associated with the find would cease until evaluated by the park archeologist or designated representative. If necessary or possible, relocation of the work to a non-sensitive area would occur to enable more site testing and documentation. Every effort would be made to avoid further disturbance to the site.

Ethnography (Guided Climbing, Guided Summer and Winter Wilderness, Additional Services)

Common to All General Conditions Above Plus:

No proposed actions would change current Native American use of existing areas. No new areas are proposed for use.

Historic Structures and Cultural Landscapes (Guided Climbing, Guided Summer and Winter Wilderness, Additional Services)

Common to All General Conditions Above Plus:

Actions that would be undertaken as part of future planning efforts (such as under the Camp Muir Development Concept Plan) would be designed to have no adverse effect on their contribution to the Mount Rainier National Historic Landmark District or the Camp Muir Historic District.

Basic preservation maintenance and/or rehabilitation measures would continue to be undertaken to preserve the structures within the area of potential effects covered by the plan. The need for these measures and their effects would continue to be the subject of consultation, as appropriate, under Section 106 of the National Historic Preservation Act.

If replacement of the non-historic Gombu shelter were to be undertaken or additional facilities constructed at Camp Muir, these would be designed to be compatible with the NHL and Camp Muir Historic District through early consultation with the SHPO.

Historic Structures and Cultural Landscapes – Additional Services

Common to All General Conditions Above Plus:

Rehabilitation of the Westside Road to serve as a shuttle route would conform to the road's inclusion on the National Register as part of the NHL and would have no adverse effect on the road or its contribution to the NHL.

Visitor Experience (Guided Climbing, Guided Summer and Winter Wilderness, and Additional Services)

Common to All General Conditions Above Plus:

More specific requirements for commercial service providers would result in additional oversight of commercial activities and an increasing ability to avoid impacts to park resources before they have an opportunity to occur.

Apply summer and winter seasonal use restrictions on the Emmons and Kautz Routes; reduce limits on Kautz and Other Routes; and establish limits for Liberty Ridge use to reduce summer crowding and attendant impacts on independents.

(Safety) Concessioners would be required to train their employees and clients in safe practices associated with the activity being conducted.

(Safety) Minimum guide to client ratios have been designated for activities described in the CSP.

(Safety) Wilderness First Responder or First Aid and CPR requirements have been incorporated into guiding requirements for all backcountry and high elevation activities.

(Safety) Avalanche training has been incorporated into all winter and high elevation guiding requirements.

(Safety) National or International technical guiding certification (lead guide) is required for Single Trip Guides.

(Safety) Maximum party sizes have been defined for the activities described in the plan.

Increase Mountaineering Day School Limits to be consistent with allocations for the Muir Route.

Wilderness (Guided Climbing, Guided Summer and Winter Wilderness, and Additional Services)

Common to All General Conditions Above

Park Operations (Guided Climbing, Guided Summer and Winter Wilderness, and Additional Services)

Common to All General Conditions Above

Socioeconomic Environment (Guided Climbing, Guided Summer and Winter Wilderness, and Additional Services)

Common to All General Conditions Above